



**ST HELENS**  
BOROUGH COUNCIL

**ST HELENS BOROUGH  
LOCAL PLAN 2020-2035**

**COPIES OF REGULATION 20  
REPRESENTATIONS (REGULATION 22 (1) (D))  
DOCUMENT**

**REPRESENTATION ORDER**

**RO1701 – RO1800**

**SEPTEMBER 2020**

RO1701



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>LESLIE</u>	First name: _____
Last Name: <u>TAYLOR</u>	Last Name: _____
Organisation/company: <u>N/A</u>	Organisation/company: _____
Address: <u>1 TERIDALE ROAD</u> <u>HAYDOCK</u>	Address: _____
Postcode: <u>WA11 0AL</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: Date: \_\_\_\_\_

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>LPA05</i> <i>214A</i>		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<i>DONT KNOW</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<i>TRAFFIC PROBLEMS IN HAYDOCK POLLUTION ON CHILDREN LUNGS CHEST, ALSO IN HAYDOCK AREA CHILDRENS GRADES IN SCHOOLS DOWN YEAR AFTER YEAR SINCE INCREASE IN TRAFFIC, LACK OF OPEN SPACES AND WOODLAND, PLENTY OF LAND AVAILABLE IN ST HELENS AREA FOR BUILDING OF HOUSES AND WAREHOUSE, BUT NEEDS CLEARING FIRST?</i>

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

*Delete this land from the proposed removal from the greenbelt*

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1702

①-LPA05  
②-LPA04

207

Ref: LPSD  
01 MAR 2019  
(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019.** Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>DAVID M</u>	First name: .....
Last Name: <u>TAYLOR</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>9 SPRINGFIELD PARK MAYDOCK</u>	Address: .....
Postcode: <u>WA11-0XP</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>LPA 05</i>	<i>SITE 2HA</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support the legal compliance or soundness of the Local Plan</u>, please also use this box to <u>set out your comments.</u></p> <p><i>Not justified - The population is in decline - who will want these houses</i></p> <p><i>More green belt release will significantly harm the remaining green belt</i></p> <p><i>Housing in this area is not sustainable because of the weak infrastructure</i></p> <p><i>Access will be inadequate</i></p> <p><i>Existing flooding problems will be exacerbated</i></p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*Delete the plan from the proposed removal from the Green belt.*

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<i>no</i>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-----------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

**3. To which part of the Local Plan does this representation relate?**

Policy <i>LPA04</i>	<i>2EA SEA 6EA</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**  
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <i>DON'T KNOW</i>
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**  
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**  
**If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.**

*HIGH VOLUMES OF TRAFFIC  
THE COUNCIL HAVE ALREADY GRANTED PLANNING PERMISSION  
IN THE GREENBELT IN RESPECT OF 2 LTA F FN.  
RISK OF FLOODING DOWN THE CHIPSET BROOK  
NOT JUSTIFIED - THE COUNCIL SHOULD BE PUT TO  
STRICT PROOF OF THE NEED FOR THIS TYPE  
OF DEVELOPMENT*

2

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED  
REMOVAL FROM THE GREEN BELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1703



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

13 MAR 2019

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
Part A – Personal Details  
Part B – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MRS</u>	Title:
First Name: <u>MARJORIE</u>	First name:
Last Name: <u>TAYLOR</u>	Last Name:
Organisation/company: <u>NONE</u>	Organisation/company:
Address: <u>101, HIGHTER LANE RAINFORD</u>	Address:
Postcode: <u>WA11 8BQ</u>	Postcode:
	Telephone No:
	Mobile No:
	Email:

Signature: Date: 10.3.2019.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or** by e-mail to: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**. If you still need assistance, you can contact us via:

**Email:** **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**  
**Telephone:** **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**.

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**



**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy <b>ALL</b>	<b>OBJECTION</b>	Paragraph / diagram / table	<b>OBJECTION</b>	Policies Map	<b>OBJECTION</b>	Sustainability Appraisal/ Strategic Environmental Assessment	<b>OBJECTION</b>	Habitats Regulation Assessment	<b>OBJECTION</b>
Other documents (please name document and relevant part/section)				<b>LPSD OBJECTION TO BUILDING BUILDING ON HIGHER LANE AND EAST OF ROOKERY LANE</b>					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Regarding the Land :- Rookery Lane - Higher Lane : The site is Grade 1 Agricultural land. Provides employment in the agricultural sector. This is threatened by removal of this site from Green Belt. The SHLP is intended to provide employment and economic growth. This will have the opposite effect, also the houses will be built very close to the Industrial Estate and subject to risk of pollution and explosion both of which have been reported recently. Also the roads are not suitable for all those houses. There is a problem at the moment and will be a lot worse with all those

Please continue on a separate sheet if necessary

houses and living in Rookery you need cars to get around.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination
--------------------------	--

<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1704



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

963

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>STEVE</u>	First name:
Last Name: <u>TAYLOR</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>5 THE PASTURES ST. HELENS</u>	Address:
Postcode: <u>WA9 4ZA</u>	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 27 April 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1705



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

964

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: DIANE	First name:
Last Name: TAYLOR	Last Name:
Organisation/company:	Organisation/company:
Address: 5 The Pastures St Helens	Address:
Postcode: WA9 4ZA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 27/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1706



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1164  
13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: SUSAN	First name:
Last Name: TAYLOR	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
[Redacted]	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 16.4.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1707



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: EDWARD	First name:
Last Name: TAYLOR	Last Name:
Organisation/company:	Organisation/company:
Address: 75, THE PASTURES BOLD, ST. HELENS	Address:
Postcode: WA9 4ZA	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 16/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1708



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1766  
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <u>MR</u>	Title:
First Name: <u>PHIL</u>	First name:
Last Name: <u>TAYLOR</u>	Last Name:
Organisation/company:	Organisation/company:
Address: <u>75, THE PASTURES BOLD, ST. HELENS</u>	Address:
Postcode: <u>WA9 4ZA</u>	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 16/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1709



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline **cannot** be accepted.

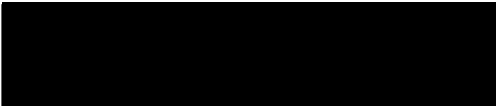
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs -	Title:
First Name: JOANNE	First name:
Last Name: TAYLOR	Last Name:
Organisation/company:	Organisation/company:
Address: 75, THE PASTURES BOLD ST. HELENS	Address:
Postcode: WA94ZA	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 16/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1710



St. Helens Council

05 APR 2019

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

PF1292

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**


**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1374

12 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable)
(we will correspond via your agent)	
Title: <u>Mrs</u>	Title: .....
First Name: <u>Ruth</u>	First name: .....
Last Name: <u>Taylor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
	Address: ..... ..... ..... Postcode: ..... Tel No: ..... Mobile No: ..... Email: .....

Signature		Date: <u>5/4/19</u>
-----------	---	---------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1711

① - LPA04    ② - LPA05    ③ - Para 1.7.2 DTC

**Representor Details**

Web Reference Number	WF0473
Type of Submission	Web submission
Full Name	Mr Paul Trelford
Organisation	
Address	30 Howards Lane, Eccleston WA10 5HY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	Yes
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

There are no exceptional circumstances to justify not using the standard method for Housing need. ②  
 The economic analysis is flawed and based on over-optimistic assumptions, the level of land needed ①  
 is therefore not as high as set out in the Local Plan, therefore there are no exceptional circumstances  
 to change Green belt boundaries.

Other reasonable alternatives have not been fully explored, including lower target figures and using ②  
 more previously developed land.

These alternatives will have less impact on the environment and lead to less need for new ②  
 infrastructure.

The Council have failed to cop-operate with other councils and have not published any statement(s) ③  
 of common ground.

For these reasons and unless the plan is significantly modified it will fail both the legal tests it has to  
 pass and the tests of soundness

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment  
 targets and by allocating more previously developed land.

**7. Please set out modification(s) you consider are necessary**

Identify and regenerate the numerous brownfield sites around already developed infrastructures

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/18/2019 8:33:56 PM
---------------	----------------------

RO1712



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1270

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: <i>James</i>	First name:
Last Name: <i>Tennant</i>	Last Name:
Organisation/company: <i>—</i>	Organisation/company:
Address: <i>1 Crocus Gardens New Bold</i>	Address:
Postcode: <i>WA9 9EE</i>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: *30<sup>th</sup> April 2019*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1713



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>Mr</i>	Title:
First Name: <i>DAVID</i>	First name:
Last Name: <i>TENNANT</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>1 CLOUDES GARDENS NEW BOND</i>	Address:
Postcode: <i>WA9 4EE</i>	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature:	Date: <i>30/4/19</i>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1714



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1772  
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs.	Title:
First Name: Paula	First name:
Last Name: Tennant	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 1 Crocus Gardens New Bld St. Helens	Address:
Postcode: WA9 4EE	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: 30 / 4 / 19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1715



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1173  
13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: <i>Bethany</i>	First name:
Last Name: <i>Tennant</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>1, Crocus Gardens New Bold St. Helens</i>	Address:
Postcode: <i>WA9 4EE</i>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date: *30/4/2019*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1716



St. Helens  
Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

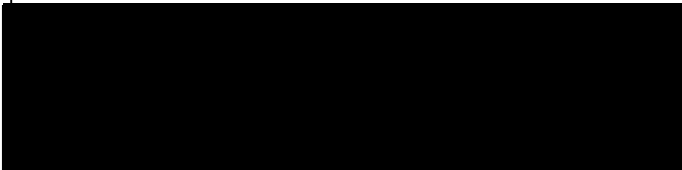
This form has two parts;


**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>KENNETH</u>	First name: .....
Last Name: <u>TETLOW</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>112 CAWENHAST DRIVE</u>	Address: .....
<u>WINDLE</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA10 6ED</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: 	Date: <u>9/3/2019</u>
--	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

<b>3. To which part of the Local Plan does this representation relate?</b>									
Policy		Paragraph/ diagram table		Policies Map	<input checked="" type="checkbox"/>	Sustainability Appraisal/ Strategic Environmental Assessment	<input checked="" type="checkbox"/>	Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

<b>4. Do you consider the St Helens Borough Local Plan 2020-2035 is:</b> Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

<b>5. If you consider the Local Plan is <u>unsound</u>, is it because it is not:</b> Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

<b>6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u></b> <b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

I am of the opinion that the area in Windle proposed for additional housing is completely unsuitable for the purpose for a number of reasons'

- (1) The land has always been and remains good quality farming land and it is unnecessary to use the land for building when other brownfield sites are available in St Helens area.
- (2) The Windle and Eccleston areas do not have facilities to handle additional residents of the proposed magnitude either for schools, health facilities, shops etc.
- (3) Calderhurst Drive is totally unsuitable as a thoroughfare being too narrow and with many obstructions due to parking vehicles generally, and specifically when Bleak Hill School children and parents are arriving and leaving. This would certainly become even more of a danger area.

RO1717

**Representor Details**

Web Reference Number	WF0042
Type of Submission	Web submission
Full Name	Miss Naomi Tewson
Organisation	
Address	77 The Pastures St. Helens WA9 4za WA9 4za
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

**7. Please set out modification(s) you consider are necessary**

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 4:16:01 PM
---------------	----------------------

RO1718



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details


**Part B** – Your Representation(s).

13 MAY 2019  
1162

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: NEIL <del>THOMAS</del>	First name:
Last Name: THOMASON	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 3 ARABIS GARDENS BOLD ST. HELENS	Address: N/A
Postcode: WA9 4ZH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: 16/4/19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

RO1719





Response to Local plan - 2020-2035

ray thomps

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:07



3 Attachments



lpsd-representation form B Thompson.docx lpsd-representation-form\_ R Thompson.docx



Statement in response to the St Helens Borough Local Plan 2020.docx

Please find attached Representation forms and attached supporting document with our objections to the above plan to build on green belt sites at Clock Face St Helens.

Yours Sincerely

Raymond and Barbara Thompson



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Barbara	First name:
Last Name: Thompson	Last Name:
Organisation/company:	Organisation/company:
Address: 9 Crawford Street	Address:
Postcode:WA94XQ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13/03/2019
------------------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)
Yes <input checked="" type="checkbox"/> (Via Email)                      No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.  
Please use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy	✓ LPA02, 03 & 05	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				As given in supporting document					

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/> Not effective
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

**As per the supporting document**

Please continue on a separate sheet if necessary

### 7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**As per the supporting document**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

*modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**Statement in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorseley lane/Crawford Street, Bold (Bold Forest Garden Suburb), on behalf of Bold and Clock Face Action Group.**

**I trust this document will be submitted, in its entirety as part of the public consultation.**

**Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035**

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23<sup>rd</sup> January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6<sup>th</sup> March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23<sup>rd</sup> January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

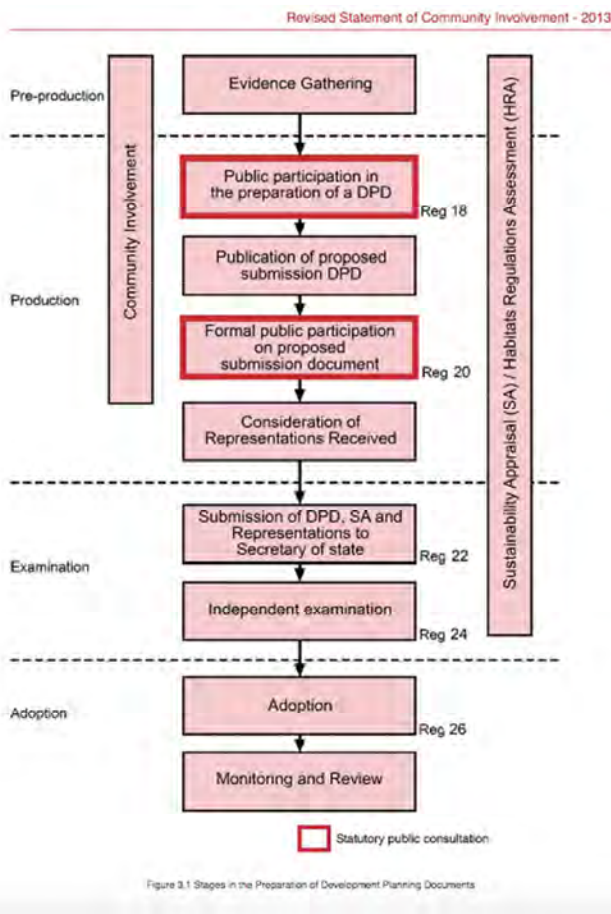
Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

[The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below \(taken from St Helen's SCI 2013 pages 7 and 13 respectively\). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document \(DPD\)' \(Reg.18\) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks \(Reg. 19\). The majority of constituents that live within the](#)

200m area surrounding 4HA (area around Bold highlighted as a strategic housing site in the draft Local Plan) were completely unaware of the document's existence and therefore their right to comment at the early development stages has been taken away. We are now post Reg 18 stage and into the Reg 20 stage. The late notice of the plan and limited timescale to understand the vast document set that makes up the Draft Local Plan has made it impossible for a reasonable level of community involvement to occur and for the plan to be articulated and understood by the affected communities. For the same reason this contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, with respect to requirements for notice and publicity, inspection by the public and nature and extent of consultation.

Formatted: Highlight



	Document preparation	Reg. 18 Stage	Post consultation feedback	Publication of DPD Reg. 20 or SPD Reg. 12	Pre-application submission	Consultation on planning application	Post-Decision
Stakeholder Meetings	•		•				
Individual Consultation Letter/email		•		•	✓	•	•
Publication in Community Magazine	•	•	•	•			
Publication on Website		•	•	•		•	•
Pub Notice <sup>7</sup> or press release		•		•			
Deposit in Public Buildings <sup>8</sup>		•	•	•	✓	•	
Presentation offered to business and community groups		•	•	•			
Consultation Letter/email to interest groups	•	•	•	•		•	
Articles in Specialist Publications		•		•			
Exhibition/ Public Meeting					✓		

Table 5.1 Methods of consultation employed at various stages

## Soundness

### ~~Draft St Helens Local Plan 2020–2035~~

The Bold & Clock Face Action Group consider the proposed plans to be unsound and should therefore not be adopted, the reasons for which have been set out below.

#### 1. Positively Prepared

It is the Groups belief that the plan does not meet the areas assessed needs and is not consistent with achieving sustainable development. [The National Planning Policy Framework \(NPPF\) \(2019\) paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There should be sufficient access to services, yet schools and doctors to name just two local services are full.](#)

The Council has stated that it needs to build 400+ homes per annum to meet housing needs. It has stated to achieve this, substantial amounts of Green Belt land must be released to realise this plan.

Following a freedom of information request, it is recognised there are currently 2,800+ houses long term empty in the borough of St Helens. In addition to this Page 11, Figure 1 – Local Plan provision – versus – household projections, Local Plans Report to Government, March 2016, Local Plans Expert Group, shows at best there is an over provision of housing in the St Helens area of 150 to 300 houses per annum and at worst an over provision of 500 houses. Sefton Council also submitted comments to



St Helens Council stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group. [Nor is the plan consistent with National Policy in relation to this issue; NPPF \(2019\) paragraph 137 requires exceptional circumstances to exist and council has examined fully all other reasonable options for meeting its identified need for development.](#)

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs*'. The removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. This area in conjunction with other proposed land to be removed from Green Belt in close proximity will have such a significant impact on the natural environment that it can never be repaired. The impact on future generations cannot be disputed and removes the ability for them to meet their own needs.

Achieving sustainable development has three overarching objectives, economic, social and environmental.

The Council will argue they are building a strong, responsive and competitive economy by allocating some of this land for commercial warehousing opportunities. As well as limited in number, not reflecting the number of houses planned, warehousing employment is generally recognised as low skilled, minimum wage employment. Looking for opportunities in this sector is also not future proofing for future generations. The Guardian recently ran an article claiming automation will take 1 in 3 warehousing jobs in the UK's northern centres by 2030. The area is also already saturated with warehousing employment with significant warehousing expansion, as part of the Omega project, undertaken by the neighbouring Warrington Borough Council.

The Bold and Clock Face areas have also been identified as suffering from higher than average numbers of people living in poverty and deprivation. Whilst the Council have claimed the vast amounts of housing development in the area will improve life for these people, it has failed to demonstrate how the removal of this land from Green belt for housing will directly contribute to those individuals health, cultural and social well-being. It can be argued this plan will have a further detrimental effect on those individuals. Limited minimum wage employment will have little impact on their ability to further their prospects. It has also been recognised people living at the lower end of the economic scale suffer from increased levels of mental health problems. In addition there is a significant and growing body of evidence that time spent in nature, or even just looking at natural scenes, can reduce mental and physical health risks. Research has also found that children with conditions such as Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder, which are increasingly common, were found to have better concentration in natural environments. These points taken in conjunction demonstrate the potential for this vast amount of urbanisation of a natural environment to have a further negative effect. This is further supported by comments submitted to St Helens Council by Natural England in 2016, which raised concerns about the impact on people's ability to access established public footpaths and natural open areas throughout the [GreenbeltGreen Belt](#). They believed this would have a negative impact on the individuals health and well-being.

The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using

natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. The Group has conducted an assessment of the Local Plan and Green Belt Review, specifically in relation to this objective. Please see the assessment attached in its entirety. The assessment highlights the reasons why, even under the Council's own Green Belt Review, the land cannot be justified in removal from the Green Belt. These reasons include:

- The rating of the land against the purposes of the Green Belt, scoring High+ when considered as a whole.
- Protection against climate change/flood risk. Level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP), would make development untenable. Even though the St Helens Strategic Flood Risk Assessment (SFRA) 2014, identified multiple areas within the location as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the location in the GBR.
- Ecology, Habitat and Biodiversity. Isolating areas of Green Belt is not a good outcome, maintaining Green Belt corridors from Clock face Country Park, enhances its viability. Protecting UK priority species and habitat is key. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species, as they require open land, however, mitigating techniques for dealing with the other UK priority species and habitats found, would again render development of the land for much of the location as untenable.
- Other significant factors.
  - Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by the open countryside.
  - Removal of the land from Green Belt will amalgamate several settlements: Clock Face, Sutton leach, Sutton, New Bold, Bold and Abbeyfield within the St Helens Borough. It will also amalgamate St Helens Borough with Burtonwood and Great Sankey within the Warrington Borough. This contravenes Purposes 2 of the Green Belt Review.
  - The location is already subject to heavy pollution (noise and air quality mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.

The Government has recently reaffirmed its commitment to Green Belt land only being developed in 'exceptional circumstances'. The Councils attempt to remove this land from ~~Greenbelt~~Green Belt can be seen as an attempt to negate this test. Michael Gove has stated the new 25 year Environment Plan aims at *'setting out plans to ensure the powerful are held to account – encouraging transparency and preventing careless or irresponsible behaviour damaging our natural environment'* (Michael Gove, New Environment Protections to Deliver Green Brexit, 12 Nov 2017). This should be a fundamental consideration when considering this land for removal from the ~~Greenbelt~~Green Belt and allocation towards housing development.

## 2. Justified

Further to the 2,800+ homes long term empty, as stated above, and the over provision of housing within the immediate area, there are also substantial areas of Brownfield land that once regenerated and brought back in to public use would have a significant positive contribution on those communities that are blighted by these areas. One of the key principals of designated Green Belt land is to encourage the redevelopment and regeneration of otherwise unusable Brownfield land ([NPPF, 2019, Section 13](#)). The release of large swathes of Green Belt land for development, fundamentally removes this incentive, burdening communities with land that in some instances could be considered dangerous with no real plan financial or otherwise for repairing and reusing the land. The Group believes the Council have failed in their duty to fully take in to account these reasonable alternatives and is therefore not an appropriate strategy.

## 3. Consistent with National Policy

NPPF February 2019 Chapter 9, Paragraph 108, part c, states when assessing sites for development, it must be ensured that, 'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The proposed development of 2,988 homes within one location and a further 2,000 homes within the immediate vicinity cannot be cost be cost effectively mitigated. The area is restricted by established, good quality viable terraced homes that prevent any significant change in structure to the transport network. Many of the directly affected access routes are main walking routes for children to and from school. The vastly increased traffic volumes and subsequent congestion will have a significant impact on the highway safety for these children.

NPPF February 2019 Chapter 9, Paragraph 109 states, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe'. It can be argued the cumulative impact of 2,988 homes in one location in conjunction with 2,000 further homes in the immediate vicinity, on the road network would be severe, due to the significant amount of extra car journeys this will impose on the main access routes. This would furthermore have an unacceptable impact on highway safety.

[In addition to the information given above, paragraph 72 of the NPPF \(2019\) states that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." In reviewing the additional evidence-based documents supplied by the council, all future infrastructure development is centred around the M6 near Haydock and J7 M62. A large-scale](#)

[development in the Bold Forest Park is currently not supported by any infrastructure plans, so currently, does not conform to the NPPF.](#)

NPPF February 2019 Chapter 11, Paragraph 118, part b, states that it should be 'recognised that some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage and food production'. The land referenced as 4HA in the LPSD, covers a variety of land types and the plan has failed to recognise the many functions these varying land types perform. The land supports many varied types of wildlife, including those on the red list for critically endangered. It provides recreation through the varied public footpaths, access routes to countryside and bridleways. It provides flood risk mitigation in an area that the St Helens Strategic Flood Risk Assessment 2014 identified as having multiple areas at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels of land in the GBR 2016.

NPPF February 2019 Chapter 11, Paragraph 118, part a, states 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for the planning permission should be refused. The land referenced as 4HA in the LPSD, as previously stated, covers a variety of land types. One such type is pasture and meadow land for grazing horses, that has been used for this purpose for many years and continues to be to the present day. The publication by Natural England, 'The Upland Management Handbook' February 2001, emphasised the importance of these pastures and meadows in supporting many endangered British Species including Lapwing and Skylark which have reduced to dangerous levels over the last 25 years. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species and therefore any development would result in significant harm to biodiversity and therefore should be refused.

[The proposals also contravenes NPPF \(2019\) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Releasing the land from Green Belt operates at odds to the NPPF, it does not promote the urban regeneration through recycling of derelict and other urban land.](#)

## **Conclusion**

The Group concludes the St Helens Local Plan 2020 – 2035 cannot be adopted in its current form, particularly in relation to land reference 4HA within the plan. The belief is the plan fails the soundness test inclusive but not exhaustive for the reasons listed above. The statement should be considered along with the Assessment of the Local Plan and Green Belt Review document, completed on behalf of the Group and submitted with this statement.

The new 25 Year Environmental Plan should be given great consideration when reviewing the plan. The Environment Bill will include legislative measures to take direct action to address the biggest environmental priorities of our age; Air Quality and Protection and enhancement of our landscapes, wildlife and habitats. Michael Gove recently reiterated his intention that we become the 'first generation to leave the environment in a better state than we found it. (New Environment Protections Set Out in Flagship Bill, 19 December 2018). Furthermore he has stated in an article published on 26 February 2019, 'The natural world is our greatest asset and we all have a responsibility and role to play in protecting it for generations to come.' (Environment Secretary Michael Gove Welcomes Green Ambassadors for Year of Green Action, 26 February 2019).

The community that is directly affected by the removal of land parcels 4HA and XXX from the Green Belt and its subsequent development is predominantly rural, with the few residential areas classed as part of one of the most deprived areas in the UK. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard. At least one large property developer has procured land within 4HA and XXX and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. Whilst the NPPF encourages the active engagement of such developers, this seems to make the process unreasonable and unfair.

Formatted: Highlight

Formatted: Highlight

#### Modification

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

If conclusions remain consistent with current findings, then Infrastructure plans need to be generated, costed and assessed on a wider Council scale to see if the large scale housing development planned in 4HA is cost effective in comparison to other local council housing and regeneration programmes (for example city centre housing redevelopment in Warrington which is more in-line with NPPF) and that the impact to the environment is justifiable.

RO1720



Response to Local plan - 2020-2035

ray thomps

to:

planningpolicy@sthelens.gov.uk

13/03/2019 14:07



3 Attachments



lpsd-representation form B Thompson.docx lpsd-representation-form\_ R Thompson.docx



Statement in response to the St Helens Borough Local Plan 2020.docx

Please find attached Representation forms and attached supporting document with our objections to the above plan to build on green belt sites at Clock Face St Helens.

Yours Sincerely

Raymond and Barbara Thompson



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

<b>1. Your Details</b>	<b>2. Your Agent's Details (if applicable)</b> (we will correspond via your agent)
Title: mr	Title:
First Name: raymond	First name:
Last Name: thompson	Last Name:
Organisation/company:	Organisation/company:
Address: 9 crawford street	Address:
Postcode:wa94xq	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

<b>Signature:</b> [REDACTED]	<b>Date:</b> 13/03/2019
------------------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes <input checked="" type="checkbox"/> (Via Email)	No <input type="checkbox"/>
Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.	



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.  
Please use a separate copy of Part B for each separate comment/representation.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### **3. To which part of the Local Plan does this representation relate?**

Policy	✓ LPA02, 03 & 05	Paragraph / diagram / table		Policies Map	✓	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				As given in supporting document					

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/> Not effective
Consistent with National Policy?	<input checked="" type="checkbox"/>

### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

**As per the supporting document**

Please continue on a separate sheet if necessary

### **7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**As per the supporting document**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

*modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**Statement in response to the St Helens Borough Local Plan 2020 – 2035, specifically in relation to LPSD Ref: 4HA Land bounded by Reginald Road/Bold Road/Travers Entry/Gorseley lane/Crawford Street, Bold (Bold Forest Garden Suburb), on behalf of Bold and Clock Face Action Group.**

**I trust this document will be submitted, in its entirety as part of the public consultation.**

**Not legally compliant because of failure to involve the community directly affected by the proposed removal of Green Belt land in the Draft St Helens Local Plan 2020 - 2035**

As part of the Councils adopted 2013 Statement of Community Involvement and in accordance with Regulation 18 of the 2012 Local Planning Regulations, letters should have been sent to all properties within 200m of sites proposed to be removed from Green Belt as part of the Draft St Helens Local Plan 2020 - 2035. The residents of Frenchfields Crescent, Crawford St, Douglas Avenue and attached streets have never received a letter, although they fall well within the 200m boundary. Many of these residents also do not receive any local newspapers and no A4 notices have been displayed on Frenchfields Crescent, Crawford St, Douglas Avenue or the surrounding residential streets as is required. As a result many residents are unaware of the publication of the Draft Local Plan, the full contents, how it affects them and the time scales in which they are able to respond.

The adopted SCI also states the Parish Council will be consulted prior to the local community being involved. The Parish Council confirmed at the Parish Council meeting on 23<sup>rd</sup> January 2019 and reiterated this confirmation at the following Parish Council meeting on Wednesday 6<sup>th</sup> March, that they have not been consulted or informed about the updated Draft Local Plan and were unaware of its contents until informed by a member of the public on 23<sup>rd</sup> January 2019.

Furthermore, as part of the 25 Year Environment Plan, it is stated as an environmental principal that the public should be able to participate in environmental decision making. This is considered fundamental to achieving environmental ambitions. Community Involvement is the golden thread running throughout the National Planning Policy Framework 2019.

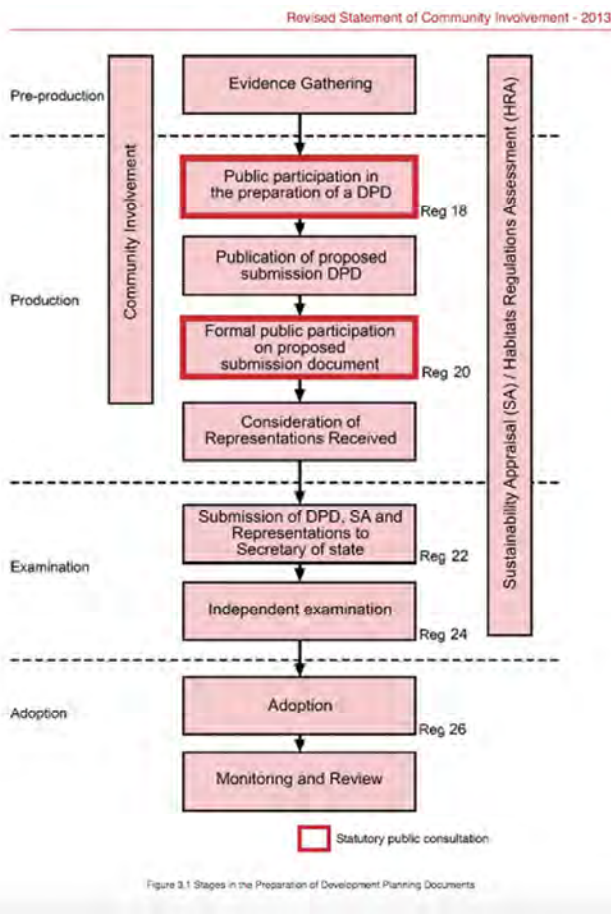
Failure by the Council to take all reasonable steps to notify all residents is in direct contravention to this principal, Regulation 18 of the 2012 Local Planning Regulations and the adopted 2013 SCI. It fails in their Code of Consultation to:

- Time consultations well and allow sufficient time to respond.
- Clearly present relevant information and encourage informed opinion.
- Be well targeted and reach out to seldom heard groups.
- Offer genuine options and ask objective questions.
- Be well planned, managed and co-ordinated.
- Be listed on Consultation Finder and be well communicated.
- Provide fair, accessible feedback.

[The methods of consultation the council would take for new policy documents are summarised in Figure 3 and table 5.1 below \(taken from St Helen's SCI 2013 pages 7 and 13 respectively\). These show that the level of engagement required by Regulation 18 has not been adhered to. Notably, the SCI says as a minimum it will 'Undertake consultation during the preparation of a Development Plan Document \(DPD\)' \(Reg.18\) and 'Publish the proposed submission document and SA for a period for representation for a minimum of six weeks \(Reg. 19\). The majority of constituents that live within the](#)

200m area surrounding 4HA (area around Bold highlighted as a strategic housing site in the draft Local Plan) were completely unaware of the document's existence and therefore their right to comment at the early development stages has been taken away. We are now post Reg 18 stage and into the Reg 20 stage. The late notice of the plan and limited timescale to understand the vast document set that makes up the Draft Local Plan has made it impossible for a reasonable level of community involvement to occur and for the plan to be articulated and understood by the affected communities. For the same reason this contravenes section 36 (Regulations) of the Planning and Compulsory Purchase Act 2004, part 2 c, d and e, with respect to requirements for notice and publicity, inspection by the public and nature and extent of consultation.

Formatted: Highlight



	Document preparation	Reg. 18 Stage	Post consultation feedback	Publication of DPD Reg. 20 or SPD Reg. 12	Pre-application submission	Consultation on planning application	Post-Decision
Stakeholder Meetings	●		●				
Individual Consultation Letter/email		●		●	✓	●	●
Publication in Community Magazine	●	●	●	●			
Publication on Website		●	●	●		●	●
Pub Notice <sup>7</sup> or press release		●		●			
Deposit in Public Buildings <sup>8</sup>		●	●	●	✓	●	
Presentation offered to business and community groups		●	●	●			
Consultation Letter/email to interest groups	●	●	●	●		●	
Articles in Specialist Publications		●		●			
Exhibition/ Public Meeting					✓		

Table 5.1 Methods of consultation employed at various stages

## Soundness

### ~~Draft St Helens Local Plan 2020–2035~~

The Bold & Clock Face Action Group consider the proposed plans to be unsound and should therefore not be adopted, the reasons for which have been set out below.

#### 1. Positively Prepared

It is the Groups belief that the plan does not meet the areas assessed needs and is not consistent with achieving sustainable development. [The National Planning Policy Framework \(NPPF\) \(2019\) paragraph 72 states that policy making authorities should work with the support of their communities to identify suitable locations where development can meet needs in a sustainable way, and supported by the necessary infrastructure and facilities. At present, the council do not have support of their communities and this level of development in one parish of St Helens is unsustainable. There should be sufficient access to services, yet schools and doctors to name just two local services are full.](#)

The Council has stated that it needs to build 400+ homes per annum to meet housing needs. It has stated to achieve this, substantial amounts of Green Belt land must be released to realise this plan.

Following a freedom of information request, it is recognised there are currently 2,800+ houses long term empty in the borough of St Helens. In addition to this Page 11, Figure 1 – Local Plan provision – versus – household projections, Local Plans Report to Government, March 2016, Local Plans Expert Group, shows at best there is an over provision of housing in the St Helens area of 150 to 300 houses per annum and at worst an over provision of 500 houses. Sefton Council also submitted comments to

St Helens Council stating the amount of land being considered for removal from Green Belt was excessive and not in keeping with advice from the Local Plans Expert Group. [Nor is the plan consistent with National Policy in relation to this issue; NPPF \(2019\) paragraph 137 requires exceptional circumstances to exist and council has examined fully all other reasonable options for meeting its identified need for development.](#)

Sustainable development can be described as 'economic development that is conducted without depletion of natural resources'. The NPPF states the *objective of sustainable development can be summarised as meeting the needs of the present, without compromising the ability of the future generations to meet their own needs*'. The removal of such a large piece of Green Belt land in one area will have an unprecedented impact on the local environment and without exception lead to depletion of natural resources. This area in conjunction with other proposed land to be removed from Green Belt in close proximity will have such a significant impact on the natural environment that it can never be repaired. The impact on future generations cannot be disputed and removes the ability for them to meet their own needs.

Achieving sustainable development has three overarching objectives, economic, social and environmental.

The Council will argue they are building a strong, responsive and competitive economy by allocating some of this land for commercial warehousing opportunities. As well as limited in number, not reflecting the number of houses planned, warehousing employment is generally recognised as low skilled, minimum wage employment. Looking for opportunities in this sector is also not future proofing for future generations. The Guardian recently ran an article claiming automation will take 1 in 3 warehousing jobs in the UK's northern centres by 2030. The area is also already saturated with warehousing employment with significant warehousing expansion, as part of the Omega project, undertaken by the neighbouring Warrington Borough Council.

The Bold and Clock Face areas have also been identified as suffering from higher than average numbers of people living in poverty and deprivation. Whilst the Council have claimed the vast amounts of housing development in the area will improve life for these people, it has failed to demonstrate how the removal of this land from Green belt for housing will directly contribute to those individuals health, cultural and social well-being. It can be argued this plan will have a further detrimental effect on those individuals. Limited minimum wage employment will have little impact on their ability to further their prospects. It has also been recognised people living at the lower end of the economic scale suffer from increased levels of mental health problems. In addition there is a significant and growing body of evidence that time spent in nature, or even just looking at natural scenes, can reduce mental and physical health risks. Research has also found that children with conditions such as Attention Deficit Disorder and Attention Deficit Hyperactivity Disorder, which are increasingly common, were found to have better concentration in natural environments. These points taken in conjunction demonstrate the potential for this vast amount of urbanisation of a natural environment to have a further negative effect. This is further supported by comments submitted to St Helens Council by Natural England in 2016, which raised concerns about the impact on people's ability to access established public footpaths and natural open areas throughout the [GreenbeltGreen Belt](#). They believed this would have a negative impact on the individuals health and well-being.

The environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using

natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. The Group has conducted an assessment of the Local Plan and Green Belt Review, specifically in relation to this objective. Please see the assessment attached in its entirety. The assessment highlights the reasons why, even under the Council's own Green Belt Review, the land cannot be justified in removal from the Green Belt. These reasons include:

- The rating of the land against the purposes of the Green Belt, scoring High+ when considered as a whole.
- Protection against climate change/flood risk. Level of mitigation to enable water to be dealt with close to its locality and not as part of the main drainage systems (as per the Bold Forest AAP), would make development untenable. Even though the St Helens Strategic Flood Risk Assessment (SFRA) 2014, identified multiple areas within the location as being at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the location in the GBR.
- Ecology, Habitat and Biodiversity. Isolating areas of Green Belt is not a good outcome, maintaining Green Belt corridors from Clock face Country Park, enhances its viability. Protecting UK priority species and habitat is key. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species, as they require open land, however, mitigating techniques for dealing with the other UK priority species and habitats found, would again render development of the land for much of the location as untenable.
- Other significant factors.
  - Mersey Forest and Bold Forest Park rely on the visual feeling of openness provided by the open countryside.
  - Removal of the land from Green Belt will amalgamate several settlements: Clock Face, Sutton leach, Sutton, New Bold, Bold and Abbeyfield within the St Helens Borough. It will also amalgamate St Helens Borough with Burtonwood and Great Sankey within the Warrington Borough. This contravenes Purposes 2 of the Green Belt Review.
  - The location is already subject to heavy pollution (noise and air quality mainly from the motorway), development should be kept to a minimum to ensure better quality of life and health for existing residents and for people taking advantage of the open spaces in the vicinity.

The plan proposes the development of approximately 5,000 new homes across the two wards of Bold and Sutton in the St Helens borough. It does not take in to account the number of houses that have already been built in these wards recently and those that are currently under construction. It also excludes any development of less than 250 properties. Taking all these areas in to account, initial estimates of 2,000 properties in addition to those included in the local plan. The impact of 7,000 new homes within a short time scale and restricted area will have a devastating impact and cause irreparable damage to the natural environment, destroy biodiversity, increase rather than minimise pollution and does not make effective use of the land.



The Government has recently reaffirmed its commitment to Green Belt land only being developed in 'exceptional circumstances'. The Councils attempt to remove this land from ~~Greenbelt~~Green Belt can be seen as an attempt to negate this test. Michael Gove has stated the new 25 year Environment Plan aims at '*setting out plans to ensure the powerful are held to account – encouraging transparency and preventing careless or irresponsible behaviour damaging our natural environment*' (Michael Gove, New Environment Protections to Deliver Green Brexit, 12 Nov 2017). This should be a fundamental consideration when considering this land for removal from the ~~Greenbelt~~Green Belt and allocation towards housing development.

## 2. Justified

Further to the 2,800+ homes long term empty, as stated above, and the over provision of housing within the immediate area, there are also substantial areas of Brownfield land that once regenerated and brought back in to public use would have a significant positive contribution on those communities that are blighted by these areas. One of the key principals of designated Green Belt land is to encourage the redevelopment and regeneration of otherwise unusable Brownfield land ([NPPF, 2019, Section 13](#)). The release of large swathes of Green Belt land for development, fundamentally removes this incentive, burdening communities with land that in some instances could be considered dangerous with no real plan financial or otherwise for repairing and reusing the land. The Group believes the Council have failed in their duty to fully take in to account these reasonable alternatives and is therefore not an appropriate strategy.

## 3. Consistent with National Policy

NPPF February 2019 Chapter 9, Paragraph 108, part c, states when assessing sites for development, it must be ensured that, 'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The proposed development of 2,988 homes within one location and a further 2,000 homes within the immediate vicinity cannot be cost be cost effectively mitigated. The area is restricted by established, good quality viable terraced homes that prevent any significant change in structure to the transport network. Many of the directly affected access routes are main walking routes for children to and from school. The vastly increased traffic volumes and subsequent congestion will have a significant impact on the highway safety for these children.

NPPF February 2019 Chapter 9, Paragraph 109 states, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe'. It can be argued the cumulative impact of 2,988 homes in one location in conjunction with 2,000 further homes in the immediate vicinity, on the road network would be severe, due to the significant amount of extra car journeys this will impose on the main access routes. This would furthermore have an unacceptable impact on highway safety.

[In addition to the information given above, paragraph 72 of the NPPF \(2019\) states that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities." In reviewing the additional evidence-based documents supplied by the council, all future infrastructure development is centred around the M6 near Haydock and J7 M62. A large-scale](#)

[development in the Bold Forest Park is currently not supported by any infrastructure plans, so currently, does not conform to the NPPF.](#)

NPPF February 2019 Chapter 11, Paragraph 118, part b, states that it should be 'recognised that some undeveloped land can perform many functions such as wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage and food production'. The land referenced as 4HA in the LPSD, covers a variety of land types and the plan has failed to recognise the many functions these varying land types perform. The land supports many varied types of wildlife, including those on the red list for critically endangered. It provides recreation through the varied public footpaths, access routes to countryside and bridleways. It provides flood risk mitigation in an area that the St Helens Strategic Flood Risk Assessment 2014 identified as having multiple areas at risk of surface water flooding in the 30 and 200 year periods, both shallow and deep to an extent, this was ignored during the stage 3 and 4 assessments of the parcels of land in the GBR 2016.

NPPF February 2019 Chapter 11, Paragraph 118, part a, states 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for the planning permission should be refused. The land referenced as 4HA in the LPSD, as previously stated, covers a variety of land types. One such type is pasture and meadow land for grazing horses, that has been used for this purpose for many years and continues to be to the present day. The publication by Natural England, 'The Upland Management Handbook' February 2001, emphasised the importance of these pastures and meadows in supporting many endangered British Species including Lapwing and Skylark which have reduced to dangerous levels over the last 25 years. Several breeding pairs of Skylark, Lapwing and Yellow Hammer have been witnessed, all on the red list of endangered species. The NBN Gateway shows corn bunting, brown hare and great crested newt have been recorded in the area. Many migratory birds have been demonstrated to use the location at different times throughout the year. It would be difficult to mitigate for many of these species and therefore any development would result in significant harm to biodiversity and therefore should be refused.

[The proposals also contravenes NPPF \(2019\) Section 13 which states in paragraph 134 that Green Belt should be protected against unrestricted urban sprawl and encroachment into the countryside. Releasing the land from Green Belt operates at odds to the NPPF, it does not promote the urban regeneration through recycling of derelict and other urban land.](#)

## **Conclusion**

The Group concludes the St Helens Local Plan 2020 – 2035 cannot be adopted in its current form, particularly in relation to land reference 4HA within the plan. The belief is the plan fails the soundness test inclusive but not exhaustive for the reasons listed above. The statement should be considered along with the Assessment of the Local Plan and Green Belt Review document, completed on behalf of the Group and submitted with this statement.

The new 25 Year Environmental Plan should be given great consideration when reviewing the plan. The Environment Bill will include legislative measures to take direct action to address the biggest environmental priorities of our age; Air Quality and Protection and enhancement of our landscapes, wildlife and habitats. Michael Gove recently reiterated his intention that we become the 'first generation to leave the environment in a better state than we found it. (New Environment Protections Set Out in Flagship Bill, 19 December 2018). Furthermore he has stated in an article published on 26 February 2019, 'The natural world is our greatest asset and we all have a responsibility and role to play in protecting it for generations to come.' (Environment Secretary Michael Gove Welcomes Green Ambassadors for Year of Green Action, 26 February 2019).

The community that is directly affected by the removal of land parcels 4HA and XXX from the Green Belt and its subsequent development is predominantly rural, with the few residential areas classed as part of one of the most deprived areas in the UK. Overall, this community has no expertise or experience and/or little opportunity either to compete on a level playing field in this planning process or to get their arguments heard. At least one large property developer has procured land within 4HA and XXX and is able to use its time, contacts, expertise and experience to influence the outcome of these proceedings. Whilst the NPPF encourages the active engagement of such developers, this seems to make the process unreasonable and unfair.

Formatted: Highlight

Formatted: Highlight

#### Modification

Remove or significantly reduce the amount of Green Belt released in the 2020-2035 because there is insufficient justification of exceptional circumstances to validate it, when taking into alternatives available in St Helens and the NPPF. Only once alternative urban and derelict land used then to release this land for development.

To significantly reduce the amount of housing allocation in Bold and Clock Face, and distribute it evenly throughout St Helens so not to radically change the make up of the rural nature and local community.

To open up the consultation process on the revised plans as the best effort made to engage with the community to develop a sustainable plan that meets the needs of the local community.

If conclusions remain consistent with current findings, then Infrastructure plans need to be generated, costed and assessed on a wider Council scale to see if the large scale housing development planned in 4HA is cost effective in comparison to other local council housing and regeneration programmes (for example city centre housing redevelopment in Warrington which is more in-line with NPPF) and that the impact to the environment is justifiable.

RO1721

ELO220



Local Plan Representations - Morris Homes

Paul Williams

to:

planningpolicy

13/03/2019 15:56



① - LPA05

② - LPA06

③ - GBR 2018

3 Attachments



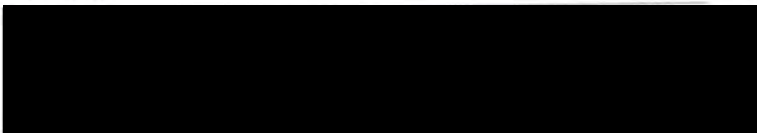
Morris Homes + Appendix.pdf Form 1.pdf Form 2.pdf

Please find attached.

With thanks,

**Paul Williams**

Director



**Mosaic Town Planning:** 10<sup>th</sup> Floor,  
Chancery Place, 50 Brown St., Manchester,  
M2 2JG

Registered in England No 06018747 at above address



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

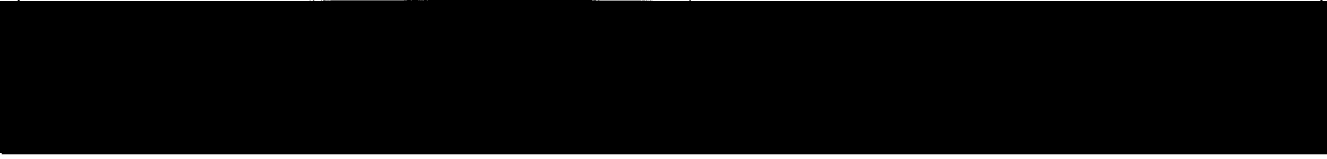
Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

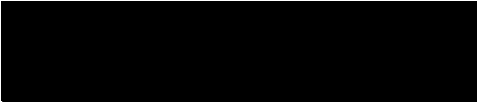
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andrew	First name: Paul
Last Name: Thompson	Last Name: Williams
Organisation/company: Morris Homes North Ltd	Organisation/company: Mosaic Town Planning
Address: Morland House, Altrincham Road, Wilmslow, Cheshire	Address: 10 <sup>th</sup> Floor, Chancery Place, 50 Brown St, Manchester
Postcode: SK9 5NW	Postcode: M2 2JG



Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) YES No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x <input type="checkbox"/>
Justified?	x <input type="checkbox"/>
Effective?	x <input type="checkbox"/>
Consistent with National Policy?	x <input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached representation



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	Yes, I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A** – Personal Details


**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title: Mr
First Name: Andrew	First name: Paul
Last Name: Thompson	Last Name: Williams
Organisation/company: Morris Homes North Ltd	Organisation/company: Mosaic Town Planning
Address: Morland House, Altrincham Road, Wilmslow, Cheshire	Address: 10 <sup>th</sup> Floor, Chancery Place, 50 Brown St, Manchester
Postcode: SK9 5NW	Postcode: M2 2JG



Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) YES No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:                                       **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:                Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:                             [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:**                                       [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:**                               01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	x <input type="checkbox"/>
Justified?	x <input type="checkbox"/>
Effective?	x <input type="checkbox"/>
Consistent with National Policy?	x <input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Please see attached representation

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination

**x**

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



**mosaic**  
town planning

# St. Helens Local Plan

---

Representations on behalf of  
Morris Homes North Ltd

March 2019







mosaic  
town planning

Mosaic Town Planning

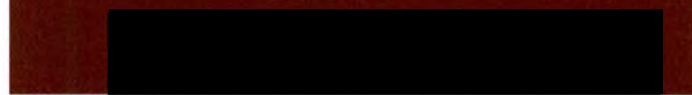
10<sup>TH</sup> Floor

Chancery Place

50 Brown Street

Manchester

M2 2JG



Prepared by:	Samantha Lee
Version:	Final
Date:	13 <sup>th</sup> March 2019



## CONTENTS

1	INTRODUCTION .....	1
2	HOUSING REQUIREMENT .....	1
	Housing Supply.....	3
3	LAND SOUTH OF ELTON HEAD ROAD .....	4
	Green Belt Assessment.....	4
	Site Specific Matters.....	6
	Conclusion.....	9
	APPENDIX A – SITE LOCATION PLAN.....	10



## 1 INTRODUCTION

- 1.1 Morris Homes are promoting the release of a site from the Green Belt and its allocation for residential development at Elton Head Road, St. Helens. ✓
- 1.2 These representations refer to the housing requirement of the Local Plan and its approach to Green Belt release, before setting out how the site is both deliverable and developable as defined by the National Planning Policy Framework. ✓

## 2 HOUSING REQUIREMENT

- 2.1 The Preferred Options Plan, involving a greater level of Green Belt release, was based on an annual requirement of 570 dwellings per annum and was intended to align housing provision with economic growth. However, the calculation based on the Government's new standard method and using 2014 rather than 2016-based figures (as suggested by the recent consultation over its application) is 468. ✓
- 2.2 The Council says that a key disadvantage of relying upon this approach is that it does not take account of increased housing need resulting from employment growth or of the long-term trend of declining affordability. **Policy LPA05: Meeting St Helens Borough's Housing Needs** now proposes a minimum of 9,234 net additional dwellings between 2016 and 2035, an average of at least 486 dwellings per annum. ✓
- 2.3 However, this represents an uplift of only 3.8% on the result of the standard method. In the Employment Land Needs Study Addendum Report up to 2037, the OAN requirement for employment land for 2012-2035 has been calculated as a minimum of 227.4 Ha. Table 7 of the St Helens Strategic Housing Market Assessment (SHMA) Update 2018 cites two scenarios of 479 or 514 dwellings being required to align with economic forecasts, but we have not seen a clear explanation of how these relate to the employment land proposals of the plan. } U
- 2.4 Planning Practice Guidance (PPG) supports the use of a higher requirement than that arising from the standard method where justified, making it apparent that it is necessary to distinguish between the use of a simple number arrived at through a statistical technique and determining an appropriate plan strategy. This is inherent throughout the document: ✓



***"The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure."*** (ID: 2a-002-20190220)

***"The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."***

- 2.5 It is also appropriate to consider the wording of NPPF at paragraph 60 which states ***"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."***
- 2.6 There are specific examples in PPG of when a higher housing total than the LHN figure might be required (ID: 2a-010-20190220). These include:
- Where there are growth strategies that are likely to be deliverable.
  - Where previous assessments of need are significantly greater than the outcome from the standard method.
  - Previous levels of delivery have been significantly greater.
  - Where it could help deliver the required number of affordable homes. (ID: 2a-024-20190220)
- 2.7 In summary, it is beyond dispute that national planning policy regards the standard method as producing a minimum figure and there is no basis for concluding that this is synonymous with the requirement. It should be a matter of routine to consider factors which should lead to a higher total. Indeed, the Government ***"supports ambitious authorities who want to plan for growth."*** None of this implies the use of an alternative method to arrive at the starting point; it is simply how the standard method should always be applied.



2.8 The intention of St Helens to increase the requirement above that arising from the standard method is therefore in accordance with national policy in principle. However it is questionable whether the minor increase proposed is sufficiently aspirational to support economic growth or materially affect affordability. It must be borne in mind that:

- Recent assessments have supported a higher requirement.
- The adopted Core Strategy has a much higher requirement and a significant reduction is not in accordance with the Government's intention to boost significantly the supply of housing.
- Gross completions in the last 4 years have been above the proposed requirement, peaking at 635 in 2014/15. This confirms the limited ambition of the proposed approach.

2.9 Morris Homes therefore object to the housing requirement as inadequate and would support a return to the level originally proposed at Preferred Options stage. It is implicit in our analysis that the Plan is not positively prepared, justified, effective or consistent with national policy.

#### **Housing Supply**

2.10 The Council has confirmed in its evidence that delivery from sites in the urban area is expected to fall substantially short of the total housing delivery required. Whilst the development of such previously developed sites should be promoted, the reality is that many of these are adversely affected by contamination and viability issues given the area's industrial legacy so that delivery will be over the longer term. Out of the SHLAA supply identified, 53% of the larger sites (over 4,000 dwellings) do not yet have permission and the Council has noted that some of those sites which do have permission have stalled.

2.11 In accordance with paragraph 136 of NPPF, we therefore agree that exceptional circumstances have been substantiated by evidence and justified to the extent that Green Belt boundaries need to be reviewed as part of the Plan. However, it follows from our representation on housing need that additional Green Belt land will be required to be released for immediate development and also safeguarded for beyond the plan period. This position was previously accepted by the Council at the Preferred Options Stage. The case to seek aspiration levels of employment growth and to address affordability remains compelling, with no substantive



changes to justify a lower housing requirement or reduced Green Belt release. Otherwise, the Local Plan will not be positively prepared, justified, deliverable or consistent with national policy.

2.12 It is also important for soundness that the plan should be able to demonstrate and maintain a 5 year housing supply from the outset. This is more likely to be achieved by releasing additional smaller to medium sizes sites from the Green Belt which can be readily delivered without major infrastructure or land assembly constraints. One such site is land at Elton Head Road, St Helens. (1)

2.13 Morris Homes therefore object to **Policy LPA02: Spatial Strategy** on the grounds that the proposed Green Belt boundaries are inadequate to meet future development needs with regard to the extent of the sites proposed for either housing allocation or safeguarding. (2)

### 3 LAND SOUTH OF ELTON HEAD ROAD

3.1 The site promoted by Morris Homes is 2.88ha of land on the southern side of Elton Head Road to the south of St. Helens and sits directly adjacent to the settlement boundary (see Appendix for plan). ✓

3.2 The site is bounded by existing residential development to the north and open countryside to the west, south and east. However, the open countryside parcel immediately to the east is already proposed for safeguarded land and there are trees to the southern boundary. There is existing built development on the south side of Elton Head Road with an enclave of dwellings to the east of the site. ✓

3.3 There are a number of services and facilities within walking distance, including a local convenience shop, pharmacies, post office and restaurants. Portico Nursery and Pre-school, Nutgrove Methodist Aided Primary School and St. Austins R C Primary School are also located nearby. ✓

#### Green Belt Assessment

3.4 According to the Revised National Planning Policy Framework (NPPF) adopted in February 2019, the Local Planning Authority should identify a variety of land to accommodate growth during the plan period. ✓



- 3.5 Paragraph 133 of the NPPF states that ***“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”***. The purposes of the Green Belt are (parag. 134):
- a) ***“To check the unrestricted sprawl of large built-up areas;***
  - b) ***To prevent neighbouring towns merging into one another;***
  - c) ***To assist in safeguarding the countryside from encroachment;***
  - d) ***To preserve the setting and special character of historic towns; and***
  - e) ***To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”***
- 3.6 Paragraphs 136 and 138 further explains that Green Belt boundaries should only be altered under exceptional circumstances supported and justified with evidence through the preparation of local plan reviews. Local Councils are required to promote sustainable development patterns when reviewing the Green Belt boundaries in particular, ***“authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”***.
- 3.7 The NPPF also outlines the criteria for defining Green Belt boundaries in paragraph 139. They are to ensure ***“consistency with the development plan’s strategy for meeting identified requirements for sustainable development”*** and to ***“identify areas of safeguarded land between urban area and Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”***. Importantly, plans should ***“demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period”***.
- 3.8 In 2018, the Council published a Green Belt Review which considered the site as part of a larger strategic Green Belt land parcel. This resulted in the site being discounted on the grounds of making high contribution to all five purposes of Green Belt. However, in a previous 2016 Green Belt study, the site was assessed on its own as a sub-parcel of a larger strategic Green Belt gap. This resulted to the subject site being proposed to be removed from the Green Belt.



- 3.9 The 2016 Green Belt Review identified the site as making a low contribution to all purposes except preventing towns merging into one another. ③
- 3.10 On the contrary, the subject site would make the same 'low' contribution as the adjacent site (Ref. 7HS) towards preventing neighbouring towns from merging into one another, as the urban areas surrounding the site form part of St. Helens core area or Rainhill key settlement. Both sites are located on the northernmost end of that strategic Green Belt gap. If development were to take place, there would still be a significant strategic gap between both settlements. The gap between site and Rainhill urban area is at least 665m, whereas the narrowest point in the St. Helens and Rainhill Green Belt gap is currently 280m. ③
- 3.11 Should the site be allocated for development, this would remain the case as the physical gap between St. Helens and Rainhill would not be eroded. Furthermore, the site forms a logical settlement boundary in combination with the adjacent site (land south of Elton Head Road), already proposed to be released from Green Belt.

#### Site Specific Matters

##### Accessibility

- 3.12 The site can be adequately accessed by vehicles and pedestrians from Elton Head Road. Taking into account the Council's advice whereby the ***"access junction would need to be situated in centre of site to ensure sufficient separation distance from both The Broads and Nutgrove Hall Drive"***, a layout plan with sufficient visibility and width incorporated could be provided at later stages of the emerging Local Plan process.
- 3.13 The site is only 5 minutes' walk away from St John Vianney R C Primary School, 12 minutes' walk away from the centre of Thatto Heath and 20 minutes' walk away from the centre of Rainhill. The services and facilities of St. Helens town centre are approximately 3.5km away from the site. ①
- 3.14 The site is accessible by public transport with bus stops close to the site on Elton Head Road, with service numbers 39 and 289 running to St. Helens town centre, Rainhill, Knowsley, Prescott and Widness. Thatto Heath train station is located approximately a 12-minute walk away and Rainhill train station located approximately a 22-minute walk away.





- 3.15 In accordance to Paragraph 103 of the NPPF, the site is therefore in a sustainable location, ***“limiting the need to travel and offering a genuine choice of transport modes”***. ] ①

Landscape, Trees and Ecology

- 3.16 The 2016 Green Belt Review concluded that the site has no ecological value and landscape significance is only low to moderate. The future development of the site will therefore not result in an adverse impact on either landscape or ecology. Instead, releasing the site for future residential development would create opportunities for biodiversity enhancements, habitat creation and landscape improvements. ✓

- 3.17 No protected trees have been identified by the Council, but an Arboricultural Impact Assessment could be undertaken for the site. The results could better inform a masterplan to ensure that the site could be developed efficiently whilst retaining any principal trees and hedgerows of higher arboricultural value. ✓

- 3.18 Any low quality scrub growth would be cleared to facilitate a greater appreciation of the improved landscape, retained trees and amenity of open space whilst maximising the development potential of the land. ✓

Flood Risks and Drainage

- 3.19 In considering sites for the development of a local plan, Paragraph 149 and 157 states that plans should ***“take into account the long-term implications for flood risks, coastal change, water supply”*** and that ***“all plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property”***. ✓

- 3.20 The NPPF explains in Paragraph 158 that the ***“the sequential test is to steer new development to areas with the lowest risk of flooding”*** and that ***“development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding”***. ✓

- 3.21 Unlike the proposed safeguarded site at land south of A580 between Houghtons Lane and Crantock Grove (Ref. 8HS) where part of the site is within Flood Zone 2 and 3, this subject site is located entirely in Flood Zone 1 as defined by the Environment Agency’s Flood Map for ✓



Planning. The land has therefore less than a 1 in 1,000 annual probability of river or sea flooding.

- 3.22 A sustainable drainage scheme will accompany any development proposals to further ensure that flood risks are reduced, water efficiency is promoted and the quality of water is protected and enhanced.

Sustainability

- 3.23 The NPPF (2019) sets out the purpose of the planning system, highlighting three overarching objectives in achieving sustainable development; economic, social and environmental. The allocation of this site for residential development would have positive economic, social and environmental benefits and would thereby comprise sustainable development.
- 3.24 In terms of the economic objective, benefits would arise from employment during the construction phase of housebuilding, ongoing expenditure supporting local shops and services, and contribution to local revenues through the New Homes Bonus and Council Tax. As acknowledged by the Council, delivering a housing scheme of approximately 54 homes on the site is viable. Such development could sustain contributions to serve any additional needs arising from future residents for open space, education or health provision.
- 3.25 With regard to the social objective, the site is able to contribute to the housing stock within the next five years due to the absence of constraints and the involvement of Morris Homes as the developer. It is important that sites like this can help contribute towards mixed communities and the needs of different groups within them, and the final tenure mix and house types will help address local housing needs.
- 3.26 In respect of the environmental objective, the site is an open grassland with no ecological value and not within the flood plain or any nature conservation designations. Developing the site will provide scope for biodiversity enhancements and habitat creation. Future proposals would also be accompanied by ecological assessments and a well-designed masterplan to ensure that a green network is maintained and the amenity value of the area is improved.



### Conclusion

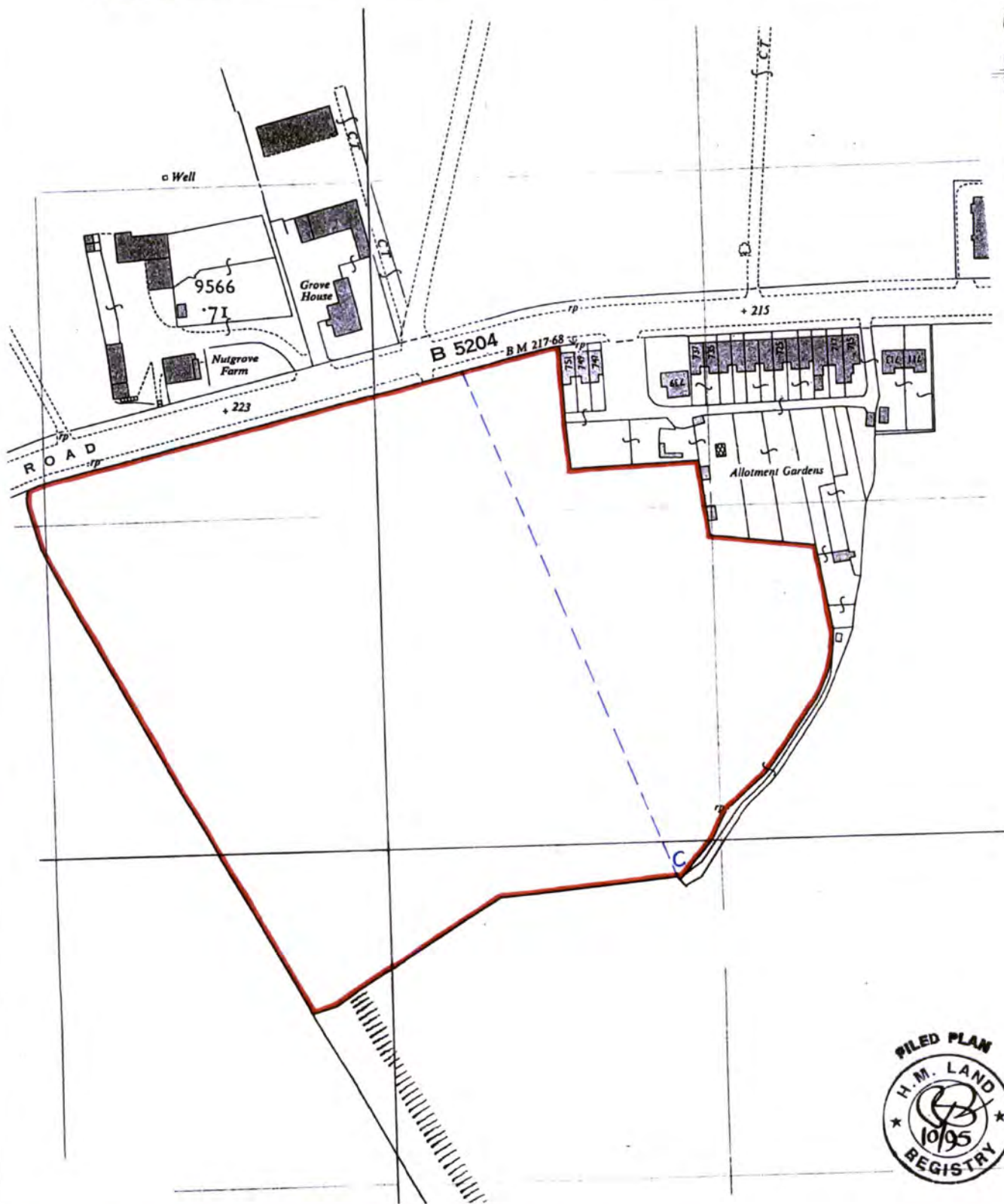
- 3.27 This representation demonstrates that the site fails to meet the five purposes for including land in the Green Belt, as outlined in Paragraph 134 of the National Planning Policy Framework and that it would relate well to the existing urban form and settlement boundary. Indeed, the Council has previously concluded that it should be released from the Green Belt. ③
- 3.28 The site is underused grassland of no particular ecological or landscape value, in a sustainable location with services and facilities nearby and easy access to larger urban centres. Its release would be in line with the spatial strategy and principles of development, Policy LPA02 and LPA03 of the emerging Local Plan. ②
- 3.29 The site is both deliverable and developable in terms of the NPPF definitions, being in a suitable location with a realistic prospect that housing will be delivered in the next five years. The landowner is willing to sell the land and an established developer is already in place to deliver a high-quality housing scheme. ①
- 3.30 It is important that St. Helens is not over dependent on large site allocations with long lead-in times, given that delivery rates from brownfield sources are also unreliable. The subject site is not of a strategic scale with associated infrastructure or land assembly issues, and as recognised by Paragraph 68 of the National Planning Policy Framework, “... **medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly**”. Morris Homes have already developed 350 homes in a successful development to the south east of the site, with a further 100 under construction. Releasing the site would provide immediately deliverable housing land, producing continuity in output and contributing to the housing supply of St. Helens and the wider housing market area. ①
- 3.31 In the event that either the Local Plan Inspector supports a higher housing requirement or concludes that the identified sources of land will be insufficient to maintain a five year supply, the site is a strong contender for immediate development. Alternatively, it should be safeguarded to ensure that housing land supply can be maintained when the Local Plan is reviewed, without the need for a further Green Belt review. ①



**mosaic**  
town planning

APPENDIX A – SITE LOCATION PLAN

H.M. LAND REGISTRY		TITLE NUMBER	
		MS369979	
ORDNANCE SURVEY PLAN REFERENCE	COUNTY	SHEET	NATIONAL GRID
	MERSEYSIDE		SJ 5092
			SECTION B Extract
Scale: 1/1250	ST. HELENS DISTRICT		© Crown copyright



This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 06 November 2018 at 13:06:38. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by HM Land Registry, Birkenhead Office.

Crown Copyright. Produced by HM Land Registry. Reproduction in whole or in part is prohibited without the prior written permission of Ordnance Survey. Licence Number 100026316.

RO1722



St. Helens Council

① - LPA04

PFO153

② - Statement of Common Ground 173

# St Helens Borough Local Plan 2020-2035 (Submission Draft)

## Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

### PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>JUNE</u>	First name: .....
Last Name: <u>THOMPSON</u>	Last Name: .....
Organisation/company: <u>RAFFD</u>	Organisation/company: .....
Address: <u>211 LIVERPOOL RD.</u>	Address: .....
<u>HAYDOCK</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA11 9RX</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. ✓

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	SITES	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
LPA OH	2 EA 5 EA 6 EA									
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant? <i>DON'T KNOW</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p><i>Not justified - the Council should be put to strict proof of the need for this type of development, in this position and on this scale.</i></p> <p><i>One of its purposes of the GREENBELT is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using GREENBELT fails to encourage this.</i></p> <p><i>The release of GREENBELT will cause considerable harm to the purpose of GREENBELT.</i></p> <p><i>The council has already granted planning permission in the GREENBELT in respect of site 2EA - FLORIDA FARM NORTH.</i></p> <p><i>The risk of flooding further down the CRIPNEY BROOK will be exacerbated by further development at this location.</i></p> <p><i>High volumes of predicted traffic will add to the already over capacity on the highways in the vicinity.</i></p> <p><i>There is no common ground with neighbouring authorities. ] ②</i></p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/> NO	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
--	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



St. Helens Council

① - LPAOS FFO154  
 ② - Statement of Common Ground 174

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
 01 MAR 2019  
 (For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts:

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: _____
First Name: <u>JUNE</u>	First name: _____
Last Name: <u>THOMPSON</u>	Last Name: _____
Organisation/company: <u>RAFFA</u>	Organisation/company: _____
Address: <u>211 LIVERPOOL RD.</u>	Address: _____
<u>HAYDOCK.</u>	_____
<u>ST HELENS</u>	_____
Postcode: <u>WA11 9RX</u>	Postcode: _____
[Redacted]	Tel No: _____
[Redacted]	Mobile No: _____
[Redacted]	Email: _____

Signature: [Redacted] Date: 23/2/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPROS SITE 2HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	DON'T KNOW	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

NOT JUSTIFIED - The council should put to strict proof of its population estimates. The population of St Helens has been in decline since 1981. Where are all the extra people coming from? One of the purposes of the GREENBELT is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of GREENBELT will cause significant harm to the purpose of GREENBELT. Housing in this area isn't sustainable because of the lack of school places doctors surgeries bus routes & other services. The use of cars is being encouraged because of the lack of facilities. The access site is inadequate, a left and in left out from the East Lancashire Rd isn't safe and the proposal for a junction at Liverpool Rd a Vicarage Rd would put additional traffic on an already overstrained highway system. There would be problems of rat-running through the proposed development. There are existing floodplain problems at this site any remedies to prevent this would place even greater amounts of water into the CHIPSLEY BROOK. There is no statement of common ground with neighbouring authorities.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the GREENBELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No ✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
------	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1723

① - LPA05  
② - GEN

388

PF0357



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: .....
First Name: <u>SANDRA</u>	First name: .....
Last Name: <u>THOMPSON</u>	Last Name: .....
Organisation/company: <u>N/A</u>	Organisation/company: .....
Address: <u>8 ANSDALL DRIVE</u>	Address: .....
<u>ECCLESTON</u>	.....
<u>ST. HELENS</u>	.....
Postcode: <u>WA10 5DW</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 8th MARCH 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		<u>Sustainability</u> Appraisal/ Strategic <u>Environmental</u> <u>Assessment</u>	<u>Habitats</u> <u>Regulations</u> <u>Assessment</u>
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> <i>No - the plan is based on flawed methodology</i>
Effective?	<input checked="" type="checkbox"/> <i>No - not deliverable</i>
Consistent with National Policy?	<input checked="" type="checkbox"/> <i>No - does not comply with NPPF 2018</i>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>1) Loss of grade 1 &amp; 2 Agricultural land that comprises most Allocated &amp; Safeguarded sites is <u>not</u> mentioned - negative impact on Farming, jobs is not considered - Brexit leaving all agricultural land is needed.</p> <p>2) the plan provides unsustainable traffic growth which will cause</p> <p>a) Severe traffic issues that will not satisfy NPPF 2016</p> <p>b) Reduce air quality, increase traffic noise, disturb the tranquillity and general health of local residents.</p> <p>3) Contaminated land / Brown field sites must be used before <u>any</u> greenbelt is built upon. Changing the classification of green belt land to Safeguarded does <u>not</u> guarantee that the land will be built upon before brownfield sites are used to build these houses on.</p>	

Just because land is contaminated - it does not exclude it from housing land eg: Shires was cleared up.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Stop to reclassification of greenbelt land to safeguarded as there are plenty of brownfield (contaminated sites) in the borough that the council could use to provide the housing need.  
 The extra houses in Ecclestone/Windle area will impact on health of residents and cause severe traffic congestion and those factors have not been taken into consideration. therefore the council are not satisfying NPPF (2016) and should reconsider their plans to reclass. by greenbelt land into safeguarded. the future will look very bleak for the people of St. Helens if health is not taken into consideration due to air pollution / stress.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1724



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1172  
13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title:	Title:
First Name: ANNE	First name:
Last Name: THOMPSON	Last Name:
Organisation/company:	Organisation/company:
Address: 50 WOOLACOME AVE SUTTON LEACH	Address:
Postcode: WA9 4NG	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 28/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1725

### Representor Details

Web Reference Number	WF0243
Type of Submission	Web submission
Full Name	Mrs Lynda Thompson
Organisation	
Address	21 Green Lane, Rainford, St Helens, Merseyside. WA11 8EJ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	LPPO Ref: HA15
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

It is official policy, both at central and council levels, that green belt land should only be released in exceptional circumstances and this is central to the law on planning in the UK. There are no exceptional circumstances in the St Helens area:

1. The population is declining
2. The town centre (the central hub of any town or city) is comprised largely of empty retail premises and this has been a slow decline over many years with few (if any) people moving into the area.
3. The argument that people will move into the area who will require housing is a fallacy – for example, the building of large, unsightly industrial units (which appears to be high priority for many councils) will only create a few jobs as they are usually operated by a small number of people and we hope that these jobs will go to local people who have lost their jobs due to the decline in the town centre and surrounding areas.
4. The latest figures from the ONS show that St Helens only needs to build 383 houses a year and St. Helens own council's housing register shows there are enough brown field sites in St Helens for nearly 6000 houses. If these most recent figures from the ONS were used, the amount of building on protected land could be significantly reduced.

5. St Helens is a borough with significant health problems (e.g. childhood obesity, high rates of heart and lung disease) and where housing is relatively cheap and in low demand. To destroy protected green belt land in such circumstances would be a step in the wrong direction given the long-term health trends in St Helens.

**7. Please set out modification(s) you consider are necessary**

The use of more, readily available, brown field sites should be considered before releasing land for development from green belt protection. The green belt was created to prevent urban sprawl and over-development. It has served that purpose well. The proposals in the Local Plan would undo that good work.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 6:44:42 PM
---------------	----------------------



RO1726

**Representor Details**

Web Reference Number	WF0251
Type of Submission	Web submission
Full Name	Mr Andrew Thompson
Organisation	
Address	21 Green Lane, Rainford WA11 8EJ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Green belt land should only be released in exceptional circumstances. The releasing green belt land in St Helens Borough is unnecessary.

St Helens has a falling population.

The latest figures from the Office for National Statistics show St Helens only needs 383 houses a year

The council's own register shows there is enough brown field land in St Helens for 5,818 houses.

That would support the council's housing supply for 15 years.

The release of Green Belt land is not justified.

**7. Please set out modification(s) you consider are necessary****8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 5:14:49 PM
---------------	----------------------

RO1727



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

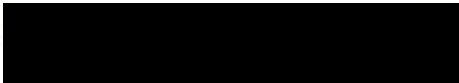
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1146 13 May 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: VICTORIA	First name:
Last Name: THORNER	Last Name:
Organisation/company:	Organisation/company:
Address: 48 GALTONS LANE, CLOCK FACE ST. HELENS	Address:
Postcode: LD9 4QZ	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1728

### Representor Details

Web Reference Number	WF0194
Type of Submission	Web submission
Full Name	Mr Ben Thornton
Organisation	
Address	18 Cecil Drive Eccleston WA10 5DF
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

Please don't ruin my future here in Eccleston ! I don't want you to force me out of the area I have lived in for all my life because of your lack of concern and understanding !  
97% of 6000 local residents have already voiced that they do not want the greenbelt to be effected.  
Why aren't you listening to this as our local council ??  
Already there are not enough spaces in the schools, GP surgeries and local hospitals/healthcare centres.  
Increasing traffic will have a major effect not only on our roads as in congestion, but also it will effect the safety of our children/residents, not to mention the added noise poorer air quality and overall general health.

### 7. Please set out modification(s) you consider are necessary

use existing brownfield sites please

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 9:37:22 AM
---------------	----------------------



RO1729

### Representor Details

Web Reference Number	WF0195
Type of Submission	Web submission
Full Name	Mrs Joan Thornton
Organisation	
Address	18 Cecil Drive Eccleston WA10 5DF
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

97% of 6000 local residents have already voiced that they do not want the greenbelt to be effected.

Why aren't you listening to this as our local council ??

Already there are not enough spaces in the schools, GP surgeries and local hospitals/healthcare centres.

Increasing traffic will have a major effect not only on our roads as in congestion, but also it will effect the safety of our children/residents, not to mention the added noise poorer air quality and overall general health.

### 7. Please set out modification(s) you consider are necessary

use existing brownfield sites

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

### 9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:

Response Date	3/12/2019 9:31:09 AM
---------------	----------------------

RO1730

### Representor Details

Web Reference Number	WF0196
Type of Submission	Web submission
Full Name	Mr Stuart Douglas Thornton
Organisation	
Address	18 Cecil Drive Eccleston WA10 5DF
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA05 and LPA06
Paragraph / diagram / table	
Policies Map	8HS
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

There is already way too much traffic in the area and with the recent changes to Windle Island and further proposals for more development on the East Lancs Road this will simply make this so much worse for everyone. There will be so much noise and traffic pollution it will be unhealthy.

There are not enough school places as it is for our kids there are no definitive plans or details to provide for this as well as doctors and healthcare - this is really poor !

Why oh why are you not already listening to what our concerns are - evidently 6000 of us have registered our concerns what more can we do to show how strongly we feel about keeping our greenbelt ??

### 7. Please set out modification(s) you consider are necessary

use existing brownfield sites !

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 9:21:08 AM
---------------	----------------------

RO1731

RO1732



ELO125



Letter from J Thow re Greenbelt Eccleston  
Doug Thow  
to:  
planningpolicy  
12/03/2019 19:23

- ① - LPA06
- ② - LPA06, 8HS
- ③ - LPA02



1 Attachment



Development objection letter 2019 J Thow.docx

Dear Sirs

Please find attached my letter for the attention of the Planning Inspector regarding the protection of the greenbelt land in Eccleston and Windle.

I would be grateful if this could be passed to the appropriate parties.

Regards  
June Thow

1 Chapel Lane  
Eccleston  
St Helens  
WA10 5DA

12<sup>TH</sup> March 2019

Dear Sirs,

This letter is to register my formal opposition to the proposal to remove from the greenbelt land in Eccleston and Windle, in particular the area described in the St Helens LPSD as 8HS. This is the land south of the A580 between Houghtons Lane and Crantock Grove, Eccleston and Windle."

First of all, I wish to complain in the strongest terms about the deliberately misleading term that is being used to describe the future status of this large area of land. We understand that it will be removed from greenbelt protection and reclassified as "safeguarded". I feel the terminology used was deliberately chosen to mask the real intention and is therefore deceitful at best.

The local plan in respect of this area is unsound and cannot be considered either positively prepared, justified, effective nor consistent with national policy. This plan does not satisfy the criteria for development to be sustainable and the reasons for my objections are developed in the individual detailed points listed below.

- 1) Developing area 8HS will result in the irreplaceable loss of top quality, highly productive farmland. At a time of growing population and food supply concerns this argument must carry the highest ranking.
- 2) There are massive areas of brownfield and semi-derelict industrial sites throughout the borough. This land may be indeed costly to remediate but at a time when developers are able to pay a £75 million bonus to a chief executive (Persimmon) and are making a profit of over £60K per house (Persimmon once again) they are clearly able to contribute substantially to land clean-up costs. Not a single home should be built on green field land until the existing stock of brownfield land is redeveloped.
- 3) Development of 8HS will result in the loss of an irreplaceable, community-cherished open space which acts as a vital "lung" barrier between the massively busy A580 and existing housing. Traffic on the A580 is forecast to increase in following years as a consequence of warehousing developments both inside and outside the borders of the borough and also the upscaling of operations at the Liverpool Superport making this barrier function even more important.
- 4) The current road system (both locally and outside the immediate area) is completely unsuitable to cope with peak time traffic – and this is before further development. Eccleston roads developed from meandering cart tracks - Houghtons Lane being a perfect example being little more than a farm track which has become a dangerous rat run by people attempting to avoid the chaos at Windle Island. Even if the roads are given a token improvement local to the development, the same pressures will be magnified away from the immediate area at junctions such as those at both ends of Chapel Lane/Church Lane/Bleak Hill Road/Rainford road etc. etc.
- 5) As a result of increased traffic, air quality must deteriorate further especially close to major junctions and areas of traffic build up.
- 6) Development of that land will result in yet another entirely car dependent (by definition – unsustainable) community bolted on at random to the extreme outskirts of the borough. We

- need more communities where walking to facilities, work and the town centre is possible, not a swathe of American style commuter suburbs disconnected in any way from the town.
- 7) The current inability of local services such as schools, doctors, dentists to cope even with the existing volume of demand is well known. These will become completely overwhelmed if the land redevelopment takes place unless substantial investment in additional public services is included. With the current squeeze on council budgets it would be optimistic indeed to assume this will be forthcoming.
  - 8) I do not believe there is local demand for such a huge development – the population of St Helens is static at best and local needs can be accommodated by selective and carefully planned infill developments (such as we have seen in places like the Triplex site and Polar Ford). The amount of greenfield land in the borough should be a source of pride, not of shame as the local consulting document suggests – **we have little enough to attract high quality businesses to this town without destroying the environment!!**
  - 9) The drainage system in Springfield Lane area was until recently unable to cope with existing discharges requiring extensive and lengthy civil engineering works to build a surge tank close to Eccleston parish church. Presumably this facility will have to be increased massively to cope with sewage from the new development?
  - 10) Right now (March 2019), parts of the proposed development site are underwater and extensively flooded due presumably to a high water table and restricted drainage thus this any housing must similarly be at risk of flooding.

In summary, if block 8HS is released from the green belt we can envisage fairly soon that a giant, random, hastily conceived bolt-on car dependent suburb bereft of local facilities will be constructed on top grade farmland. The NPPF 2018 requires that all plans be sustainable – it should be clear to all that development of such a suburb does not in any way fit this requirement.

I would be most grateful if the issues and objections raised above be taken into consideration at all relevant stages of the planning process.

Kindly note that I attempted to complete the online representation form as preferred by the council. Apart from being difficult to navigate there is no acknowledgment to state that the completed form has been consigned once the send command is issued. This letter attempts to replicate the comments made on that form.

Yours faithfully

June Thow

RO1733

352

# Lowton East

Neighbourhood development forum

15 Springmount  
Lowton  
Warrington  
Lancashire  
WA32QH

  
[www.lendf.co.uk](http://www.lendf.co.uk)

Local Plan  
St Helens Council  
Town Hall  
Victoria Square St  
St Helens  
WA101HP

08 MAR 2019

05/03/2019

We write to object to your draft local plan.

We have grave concerns over the amount of greenbelt land you are proposing to use for industrial use at both Haydock and Parkside East Newton le willows.

All the land in question is excellent farming land and has produced crops for many years.

It is noticeable that you are placing all this industry on your borders, it will have little effect on the bulk of your area but cripple Newton le Willows, Golborne, Ashton, and Lowton.

I wish to represent our organisation at the oral part of the examination to discuss this with the government inspector.

Ed Thwaite

  
Chairman

RO1734



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

264

Site 3HS  
① - LPA06  
② - TIA

PF0243

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>MARK PETER</u>	First name: .....
Last Name: <u>TICULE</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>23 WEDGEWOOD GARDENS</u>	Address: .....
<u>ST HELENS</u>	.....
<u>MERSEYSIDE</u>	.....
Postcode: <u>WA9 5GA</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED] Date: .....

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	SEE ATTACHED	Paragraph/ diagram table	SEE ATTACHED	Policies Map	3HS	Sustainability Appraisal/ Strategic Environmental Assessment	X X X	Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)				TIA (SEE ATTACHED) REF TO 3HS (BHA IN TIA)						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>
SEE ATTACHED COMMENTS ON WHY 3HS (ECCLESTON PARK GOLF CLUB) IS NOT SUITABLE FOR DEVELOPMENT, AND DEVELOPMENT WILL BE DETRIMENTAL TO EXISTING INFRASTRUCTURE. INSUFFICIENT CONSIDERATION AT SCOPING GIVEN. STATISTICS USED IN THE PLAN (ONS) IS ALREADY OUT OF DATE

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

ADDITIONAL FEASIBILITY REQUIRED TO DEMONSTRATE THAT SITE IDENTIFIED AS STRATEGIC AND SAFEGUARDED CAN ACTUALLY BE DEVELOPED TO THE LEVEL ANTICIPATED PRIOR TO REMOVAL FROM THE GREENBELT. SEE ATTACHED - WRITTEN RESPONSE REQUIRED FROM ST HELENS COUNCIL

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

## St Helens Borough Local Plan 2020-2035

### Comments on Draft Proposals Relating to Traffic Impact, Highways and Associated Infrastructure for the Former Eccleston Park Golf Club. Referred to in the Local Plan as 3HS, also referred to as HA8 in WSP Traffic Reports. Within this Report Reference HA8 has been used.

Included in the Documents Draft proposals are a St Helens Saturn Model and Local Validation Report, it has been developed to assist St Helens Council in assessing the Traffic Impacts of Schemes in the District. This model has been meticulously built from the Liverpool City Region Transport Model (LCRTM) network and clearly has involved a great deal of work and investment by the Council and includes traffic data of not only the St Helens Borough but, when relevant, its neighbouring Authorities.

It was developed so that it would be used to aid scenario planning and Paragraph 11.3 of the Local Validation Report states that "The model has been developed as a tool for testing local developments across the St Helens District. It also lists one of its potential applications Infrastructure Scenario Testing – employment and housing allocation/green belt".

The model is further used in the Traffic Impact Assessment and in page 2 paragraph 1.4, Overview and Methodology states that "The analysis looks to explore any issues and weakness within the existing transport network". It further defines factors of consideration in the evidence based process in compiling the report and lists items such as "assessing the current performance of the highway network, and comparing the results with a number of future scenarios". It also states, that when assessing such sites, that "Detailed site visits would be made to those site allocations considered 'strategic', or of an equivalent size". It lists that "Engagement with various stakeholders and neighbours, including Highways England and Merseytravel" would take place.

Paragraph 2.4.21 of the TIA under Policy LPA05.1 – Strategic Housing Sites identifies the land formally used by Eccleston Park Golf club HA8 as such a Strategic Site.

The TIA specifically considers the sites suggested in the Local Plan Preferred Options (LPPO) as allocations for the period 2020 to 2035 but states that it is not a TIA of the Proposed Submission Version of the Local Plan. It would appear that junction analysis and forecasts take into account the traffic impact of the preferred option and exclude those sites identified as safeguarded. It could be argued that Strategic Safeguarded sites, even at this stage, could be added to the model. However, it would appear that there are anomalies in the TIA report and if added to the model for the scenario purposes may present incorrect forecasts, table 4 page 55 WSP TIA shows an expected yield of 585 dwellings an anomaly may therefore exist between forecasts of site capacity.

2

HA8 has been identified within the Submission Draft Plan for 2020-2035 as a safeguarded housing site. The estimated combined capacity of safeguarded sites post 2035 delivery is 2500 dwellings. Of this figure it is anticipated that over 38% may be yielded from HA8. This is a significant proportion of future housing needs given that the site has major constraints that could have been, given the strategic nature of the site, identified at scoping stage. The WSP TIA 4.1.3 states that—"it has been impracticable to consider and undertake detailed analysis on every potential site and therefore an appropriate and proportional approach to assessment has been undertaken with a greater focus of sites of a considerable size, primarily those identified in the emerging St Helens Local Plan as the Strategic Housing and Employment sites". Given HA8 level of strategic importance and with extensive array of traffic data and modelling, it may be possible to demonstrate that HA8 may be unsuitable for development at the levels anticipated at this stage. It may demonstrate that the existing highway infrastructure is not capable of this level of development prior to its proposed safeguarding and removal from the Green Belt. This may have been indeed appropriate and proportional to the scoping of this site and other safeguarded sites. The existing highway infrastructure in the site and to the periphery of the site may be discussed as follows:

1

1

Traffic expected to be generated by this large 49 hectare strategic development with an expected capacity of 956 housing units would be significant. A site visit may have provided the relevant information at scoping stage, the visit may have shown that, due to many constraints, that the site may not be suitable to generate the level of anticipated strategic development. A basic desk top study, site visit, brief engagement with neighbours and other stakeholders may have shown that:

- HA8 is currently bounded by land adjacent to Rainhill Road, Portico Lane and Two Butt Lane. The entrance and exit from the site is currently from Rainhill Road, which lies to the East of the site and crosses land which is under the management of The Woodland Trust. It is understood that an agreement for access to HA8 was made with the Woodland Trust by previous owners. HA8 would currently be land locked to the East without this agreement. Any significant development would need improvement to the existing access point which would require major upgrading to bring it to adoption standard and to function to serve such a large development. Improvement required includes widening and realignment. It would appear that The Woodland Trust has not agreed to such an improvement and land required for any realignment would be subject to their agreement.
- Reference to the operating efficiency of the Junction of Scholes Lane with Thatto Heath Road could be made. It would appear that the TIA does not demonstrate the inevitable increase in traffic at this junction should HA8 go ahead. It is unlikely that any significant improvement at this location could be made due to physical constraints (land availability and statutory undertakers plant). To make Highway Improvements at this junction would be very challenging, if not at the moment impossible, given the fact that significant pedestrian movements need to be catered for in this local shopping centre. Alteration to the Traffic Signal phasing may be complicated to allow for continued controlled pedestrian movement whilst trying to accommodate increased Traffic flow. The TIA identifies that likely traffic generated from HA8 is 585 dwellings (a figure that may be incorrect) and modelling may

demonstrate that even on a stand-alone basis of development (without the preferred options) then the Scholes Lane Junction with Thatto Heath Road may exceed capacity. Some level of Traffic would undoubtedly be drawn through this Junction with its popular shopping centre.

- A new access to HA8 may be required to allow safe access/egress to development, the most likely being from Portico Lane. However, Portico Lane may struggle with additional traffic that HA8 would be likely to generate. There is no ideal location on Portico Lane where desired forward site visibility can be achieved. WSP Sustainable Transport Impact Report 4.11.23 states that the size and location of the site provides a case for diverting a bus route. This would imply that access to the site would be best served with a Distributor Road of a width of 7.3m or more. There is no suitable location on Portico Lane for a site access with adequate site lines, junction stagger or road width for the HA8 site. This can only be achieved with significant improvement to Portico Lane. Current road width along this route is restricted in locations to 6.152m. A basic Feasibility Study would demonstrate that improvement to this road to allow for development access may be prohibitive. It could be subject to third party agreement (Rail) Statutory Undertakers Diversions and co-operation of local land owners .

- Consideration for access/egress to HA8 could be given from Holt Lane and Two Butt Lane. However, Signalised Junctions at Holt Lane Junction with Warrington Road and Delph Lane Junction with Two Butt Lane limit traffic flow to and from the site and may not be suitable to take the level of traffic generated by such a significant development. Two Butt Lane has existing Traffic Calming measures and this may restrict movement. The junction operation of Warrington Road/Holt Road have other considerations such as parking restrictions and the near location of Whiston Hospital Access. Early use of the model could be used within the TIA. It may demonstrate that even on a stand-alone basis of development (without the

preferred options) then the Holt Lane Junction with Warrington Road and Two Butt Lane Junction with Delph Lane may exceed capacity.

- Other site constraints and existing infrastructure may also prevent the level of development expected from HA8. It is appreciated that an initial site visit would have detected the large HV Pylons, easements to this Electrical Plant and safe maintenance requirements may limit the development of the site. This, together with potential severance of HA8 to the North due to the Railway Line provides a further restraint.

- The site has a surface reservoir and a history of unchartered water culverts crossing the site. Water features exist on the surface which may or may not be associated with its previous use as a golf course. Local Knowledge has suggested that the former owners of the course carried out regular ground water monitoring, with varying results. It may suggest seasonal variations in the water table, the possible presence of a perched water table or artesian conditions. Although the site is not currently shown by the Environment Agency as At Risk, current development on the site is minimal and would only generate a small amount of surface water run-off. HA8 has been identified in the Local Plan Submission Draft as an area of 49 hectares. It would be reasonable to assume that the 956 dwellings anticipated would result in 20% of this area being impermeable as a result of development. Basic calculations would demonstrate that this would result in a site run off of surface water of 1300 litres/sec in storm conditions . An extensive flood risk assessment may only be carried out at Planning Application Stage and United Utilities and other key stakeholders such as the Environment Agency may not have commented until this stage. However, a desk top study and site visit may have shown that the site is not developable to the level anticipated. It is appreciated that the Council has Flood policies and Consultation protocol in place but, these may only be brought into play following removal from the Green Belt should the Plan be approved and subsequent planning applications generated.

Without initial feasibility, the amount of money that may be needed to be spent on both drainage and highway infrastructure may not allow for economic development and provision of affordable housing. This may certainly be the case for the former Eccleston Park Golf Course, and as recommended by the Council's TIA Consultant, WSP - the scoping exercise carried out should have been indeed appropriate and proportional to the level of development for this potentially Strategic Safeguarded Site.

①

Statistical data presented in the plan may be already out of date (ONS) and may not take into account emerging demographics brought about by wider political and social influence. Without taking these anticipated changes into account, it is difficult to assess the future needs of the Borough and it is questioned, if a review can be concluded and the 2012 Local Plan Core Strategy for St Helens replaced, until the needs of the Borough are known and also the Plans of the Borough's Neighbours are taken into account (see WSP TIA 2.3.34 to 2.3.45). Plans for the future needs of the Borough need to be in congruence and run concurrently with its neighbours.

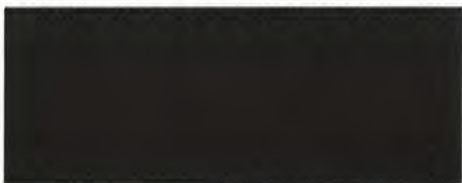
①

The risk to both the Council and residents of giving up the Green Belt area to Safeguarding and later potential development without first carrying out suitable feasibility studies is immeasurable. Should the Green Belt be offered up for something that cannot be achieved, then both the Council and residents may be left with something that neither requires a site with no real substantial objective purpose, potentially abandoning Green Belt with little prospect of being used to its full potential and indeed may produce a poor planning outcome.

①

The need to safeguard land identified as strategic site HA8 (3HS in the published Local Plan) and remove from Green Belt within the St Helens Local Plan 2020-2035 may not have been demonstrated and is premature.

①



1/3/19

MARK PETER TUCKE  
P.4. Dip., I. Eng. M.C.I.H.T.



RO1735



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>DARREN</u>	First name: _____
Last Name: <u>TINSLEY</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>62 SMOCK LANE</u> <u>GARSWOOD</u>	Address: _____
Postcode: <u>WN4 0SN</u>	Postcode: _____
	No: _____
	Mobile No: _____
	Email: _____

Signature: Date: 8/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)
- No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 Site IHA.	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.

See separate sheet attached.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed  
removed from the Green Belt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

1. Greenbelt land should only be released in exceptional circumstances.  
There are no exceptional circumstances in St Helens, which is a borough with a falling population.  
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.  
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.  
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.  
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.  
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
  - a. Water mains run through site 1HA
  - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
  - c. Drainage in the area is very poor – site 1HA regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

①

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA06 Site IHS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

See separate sheet attached

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed  
removed from the Green Belt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



1. Greenbelt land should only be released in exceptional circumstances.  
There are no exceptional circumstances in St Helens, which is a borough with a falling population.  
The proposal is for 486 houses every year, but National Statistics show St Helens only requires 383 per year.
2. Greenbelt was created to prevent urban sprawl and overdevelopment, which to date has worked effectively.  
The Local Plan will undo all the good work to date.
3. The amount of Greenbelt and the general availability of open spaces available to the public are diminishing. Public fields and footpaths are currently very well used by local residents.
4. Councils own register shows that there is enough Brownfield land for 5,818 houses, which would support the Councils housing supply, on its inflated figures, for nearly 12 years.
5. There would be a detrimental effect to local wildlife.  
Protected species are known to be nesting in the proposed site.
6. The local infrastructure would struggle to cope with the additional strain on services such as doctors, schools and other public services.  
These services are already stretched and the chance of people 'falling through the gap' is much more likely, with social and care services being most affected.  
Given that the proposed sites are very close to the district border with Wigan, urban sprawl and the consequential blurring of the lines between townships will also have a negative impact as it becomes more unclear which 'area' certain people fall into and so services miss potentially vulnerable persons.
7. The road network around Smock Lane and Billinge Road is already under great stress. There are frequent accidents at the roundabout at the end of Billinge Road and additional traffic will only make the situation worse.
8. Surely development of these sites would be prohibitively expensive given:
  - a. Water mains run through site 1HS
  - b. Significant mining in the area in the past could result in the need for increased groundworks (Development of residential property on the North east side of site 1HS several years ago costs many thousands of pounds more than anticipated due to the poor ground quality)
  - c. There is a bell pit under site 1HS
  - d. Drainage in the area is very poor – site 1HS regularly floods in wet weather. If this site is developed where will the water go – through the existing estates?

2

RO1736

13 FEB 2019

John Tirebuck  
30, Ashgrove Crescent  
Billinge  
Wigan  
Lancs  
WN5 7NH

8<sup>th</sup> February 2019

Local Plan  
St Helens Council  
Town Hall  
Victoria Square  
St Helens  
Merseyside  
WA10 1HP

Dear Sir or Madam,

Thank you for your communication of Jan 16<sup>th</sup> 2019, concerning plans to build on Green Belt land close to Beacon Road, Billinge, and backing onto Ashgrove Crescent.

I am unable to view your revised plan for myself as [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] but I can imagine a slightly revised number, but still an intention to destroy an important habitat for species avian, amphibious and entomological, and further pollute our choking atmosphere.

Traffic pollution is already at an all-time high in this area, and does not meet government standards, children are dying prematurely from respiratory diseases, buses stopped running on this estate years ago because of double parking, and yet you are intending to increase traffic on our already congested roads by thousands more.

Trees and fields are the lungs of our town. To tear them out is an act of not just vandalism, it is closer to murder of the innocents.

Yours sincerely,

[REDACTED]

John C. Tirebuck.

RO1737



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2018

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**


**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

01 MAR 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>CHRISTINE</u>	First name: .....
Last Name: <u>TITTERINGTON</u>	Last Name: .....
Organisation/company: <u>/</u>	Organisation/company: .....
Address: <u>55 THORNHILL ROAD</u> <u>GARSWOOD, ASHTON-IN-MAKERFIELD</u> <u>WIGAN</u>	Address: .....
Postcode: <u>WN4 0SR</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 25th FEBRUARY 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA 05 I HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	DON'T KNOW
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>HOUSING IN THIS AREA IS NOT SUSTAINABLE BECAUSE OF LACK OF INFRASTRUCTURE SUCH AS SCHOOLS, DOCTORS SURGERY, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED DUE TO LACK OF FACILITIES. OUR ROADS ARE NOT FIT TO COPE WITH THE AMOUNT OF TRAFFIC NOW, FURTHER DEVELOPMENT HERE WILL CAUSE SERIOUS DAMAGE TO THE LOCAL ENVIRONMENT.</p> <p>THIS LAND SHOULD STAY IN THE GREEN BELT AND BE USED FOR AGRICULTURE WHERE IT IS MOST NEEDED.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

NO	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*(This area contains a faint, illegible handwritten line.)*

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



77

Ref: LPSD

01 MAR 2019

(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

01 MAR 2019

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS.</u>	Title: .....
First Name: <u>CHRISTINE</u>	First name: .....
Last Name: <u>IMPELLINGTON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>55 THORNHILL ROAD</u> <u>GARSWOOD</u> <u>ASHTON-IN-MAKERFIELD</u>	Address: .....
Postcode: <u>WN4 0SR</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: Date: 25th FEBRUARY 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA06 IHS.		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

HOUSING IN THIS AREA ISNT SUSTAINABLE BECAUSE OF LACK OF SCHOOLS, DOCTORS SURGERYS, BUS ROUTES AND OTHER SERVICES. THE USE OF CARS IS BEING ENCOURAGED BECAUSE OF THE LACK OF FACILITIES. THIS LAND SHOULD STAY IN THE GREEN BELT AND BE USED FOR AGRICULTURE WHERE IT IS MOST NEEDED.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREENBELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1738

305

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

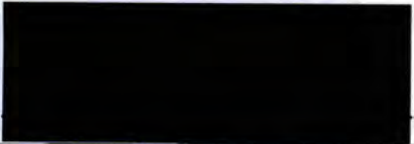
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>TOMLINSON</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>Clock House</u> <u>HMEROCK</u> <u>HESKIN</u>	Address: _____
Postcode: <u>PR57PU</u>	Postcode: _____
Tel No: <u>PR75PU</u>	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:  Date: 8/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
IHA LPAS		Small CLAN		①						
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
Plan does not satisfy policy framework 2018 section 13 - Protecting Greenbelt ①



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete plan for proposed  
Removal of green belt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

# PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHS LPA06		Branch 2		2			
Other documents (please name document and relevant part/section)							

**4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**  
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

**5. If you consider the Local Plan is unsound, is it because it is not:**  
Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**  
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

I think - REAS not suitable

2

⑦ i Delete plan for proposal

Removal of ~~greaset~~

⑧ No

RO1739



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

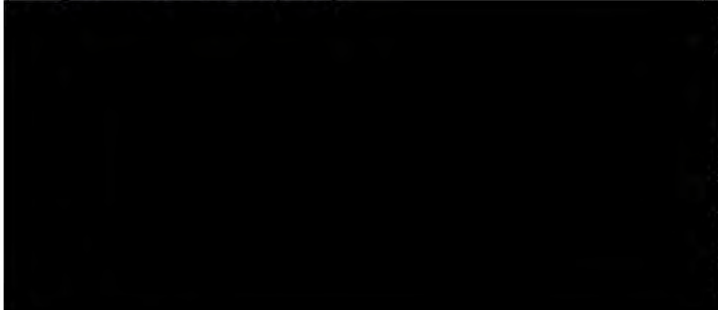
This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).


1094

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>MRS</i>	Title:
First Name: <i>CHRISTINA</i>	First name:
Last Name: <i>TOOMEY</i>	Last Name:
Organisation/company:	Organisation/company:
	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date: *4/4/19*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1740

① - LPA06

② - LPA06

515

PF0468

12 MAR 2019



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>BARBARA</u>	First name: _____
Last Name: <u>TOPPING</u>	Last Name: _____
Organisation/company: <u>LOCAL RESIDENT</u>	Organisation/company: _____
Address: <u>33. ABINGER RD. GARSWOOD, ASHTON-IN- MAKERFIELD</u>	Address: _____
Postcode: <u>WN4 0RN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 06/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate? <i>LPA 06 - Site 145</i>							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	<i>DONT KNOW</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u> If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to <u>set out your comments.</u>
---

*WHY* are they not looking at all the brown field sites, the number of empty properties and when they can improve of these. Sverage, Water supply, School already full as is Doctors Surgery, transport services, roads, Buses. Senior People, Social areas for everyone ie Children, Teenagers. Disable access at Station (non existance), Police, Ambalances, fire engines. **MORE HOUSES**  
**WHAT ARE YOU PHANNING: WE DONT NEED ANY**

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*"Delete this land from the proposed removal from the Greenbelt."*

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>No</b>	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
-----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
145 LP Add Bill		Bill								
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Infrastructure - Doctors Dentist</p> <p>Housing figures incorrect</p>	<p>]</p> <p>(2)</p>

⑦ Delete the 1st from page  
remove of gearbelt

RO1741

① - LPA06    ② - Statement of Companion  
517 Ground  
③ - LPA06

12 MAR 2019

Ref: LPSD  
  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR.</u>	Title: _____
First Name: <u>PHILIP</u>	First name: _____
Last Name: <u>TOPPING</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>33 Apinax Road</u> <u>Garswood Ashton-in-</u> <u>Makesfield WIGAN</u>	Address: _____
Postcode: <u>WN4 0RN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature: \_\_\_\_\_ Date: 05/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)
- No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>LPA 06</i>	<i>Site IHS</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No <i>Don't know</i>
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

*Council population estimates are not credible; St Helens population in decline. Abuse of Greenbelt preservation ideal when 'brown' site & urban derelict sites exist - just too 'greedy' to spend money on cleaning up these sites which would be environmentally intelligent! A great increase in housing will necessitate major infrastructure (sewers, medical facilities, bus route etc. which although expedient won't be provided. Car access via Billing, Heyland Green & Garswood roads - horrendous congestion. No statement of common ground with neighboring authorities*



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove this piece of land from the proposal of its removal from Greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

--

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHS LP A06		Billige B					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
Housing figures wrong - Branford site not used ] (3)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete the 10 for paper email  
of green belt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

X

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1742



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A – Personal Details**  
**Part B – Your Representation(s).**

1194

**PART A – YOUR DETAILS**

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name: JACKIE	First name:
Last Name: TOSE	Last Name:
Organisation/company:	Organisation/company:
Address: 14, ARABIS GARDENS NEWBOLD, ST HELENS	Address:
Postcode: WA9 1ZH	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile N: [REDACTED]	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 9/5/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1743



St. Helens Council

362

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>CHARLES ROBERT</u>	First name: _____
Last Name: <u>TOWNER</u>	Last Name: _____
Organisation/company: <u>—</u>	Organisation/company: _____
Address: <u>29 FISTRAL DRIVE</u>	Address: _____
<u>WINDLE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA10 6EF</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No:	Mobile No: _____
Email:	_____

Signature: Date: 9-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
	✓						✓		✓	
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> NO - Its based on flawed methodology
Effective?	<input checked="" type="checkbox"/> NO - Not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> NO - Not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
1/	Requirement for sustainable development has not been satisfied
2/	Does not satisfy the criteria for Sustainable Transport as the plan promotes increased car dependency remote from transport hubs.
3/	Does not satisfy sustainable housing. Targets are based on aspirational employment growth predictions.
4/	Does not provide effective land use as it concentrates on green space development, over town centre development with higher densities.
5/	Not satisfy food security by ignoring agricultural land quality.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- 1/ Economic growth predictions are based on flawed historical data that does not justify the aspirational targets included in the plan.
- 2/ Adequate regional and cross border collaboration has not been undertaken.
- 3/ The housing need assessment doesn't use standard methodology and no case for exceptional circumstances has been made.
- 4/ The latest estimates produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing needs. The Council are using an older forecast from 2014 of 486 houses.
- 5/ The plan makes no mention of brownfield and previously developed land that is not (yet) available or included on Brownfield Register.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage. see over →

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

- 6/ The council statement of 'Contaminated Land Sites 2015' indicates that 3170 ha of the lowest priority contaminated land exists in St. Helens. Two green belt sites of 56.6 + 148 ha are being reclassified as safeguarded and included to fulfil the housing need, much less than 7% of the 3170 ha available, if it were to be remediated.
- 7/ The Council in conjunction with LCRC and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period nor the 25 year safeguarded period.
- 8/ The loss of Grade 1 + Grade 2 agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and Distribution jobs is not considered.
- 9/ The Borough has significant long term and intractable problems at Windle Island, Black Hill Road Skew Bridge, M6/J23 and J21-26. The Infrastructure Delivery Plan refers to current road improvements, but does not outline how local and borough wide road improvements are to be made and funded.  
The plan promotes unsustainable traffic growth, causing severe traffic issues that will not satisfy the NPPF (2016)
- 10/ The increase in traffic proposed will have a significant impact on air quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- 11/ The plan fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague.  
There is no indication or reference to collaboration with the Hospital Trust, local CCGs, or Education Authorities.

RO1744

269



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JANET</u>	First name: _____
Last Name: <u>TOWNER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>29 FLITWAL DRIVE</u> <u>WINDLE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA10 6EF</u>	Postcode: _____
Tel No: [REDACTED]	Tel No: _____
Mobile No: [REDACTED]	Mobile No: _____
Email: [REDACTED]	Email: _____

Signature: [REDACTED] Date: 6<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> The plan is not deliverable
Consistent with National Policy?	<input checked="" type="checkbox"/> It does not comply with NPPF 2018.

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>① The requirement for Sustainable development has not been satisfied.</p> <p>② The vision does not satisfy the criteria for Sustainable Transport as the plan promotes increased car dependency remote from transport hubs.</p> <p>③ The plan does not satisfy sustainable housing targets proposed are based on aspirational employment growth predictions.</p> <p>④ The plan does not satisfy effective land space by concentrating on Green Space development over town centre developments.</p> <p>⑤ The plan does not satisfy food security by ignoring Agricultural Land Quality</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1/ Economic growth predictions are based on flawed historical data that does not justify the aspirational targets included in the plan.  
 2/ A adequate regional + cross border collaboration has not been undertaken.  
 3/ The housing Need assessment doesn't use Standard Methodology + no case for exceptional circumstances has been made.  
 4/ The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be reqd to meet housing need in St. Helens. The Council are using an older forecast (2014) of 486.  
 5/ The plan makes no mention of Brownfield + Previously Developed ~~land~~ land that is not (yet) available or included on the Brownfield register.

Please continue on a separate sheet if necessary.

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



- 6/ The St Helens Council statement of Contaminated Land indicates that 3170ha of the lowest priority contaminated land exists in St. Helens. Two Green Belt sites of 56.6 ha + 14.8 are being reclassified as safeguarded land sites + included to fulfil the housing need, much less than 7% of the 3170ha available, if it were to be remediated.
- 7/ The council in conjunction with Liverpool City Region Combined Authority + neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15 year plan period or the 25 year safeguarded period being considered.
- 8/ The loss of Grade 1 + 2 agricultural land that comprises most Allocated + Safeguarded sites is not mentioned. The negative impact on farming + distribution jobs is not considered.
- 9/ The Borough has significant long term + intractable problems at Windle Island, Bleak Hill Road. The Infrastructure Delivery Plan refers to current road improvements but does not outline how local improvements are to be made + funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016).
- 10/ The increase in traffic proposed in the Plan will have a significant impact on air quality, noise, tranquility + general health. It does not promote less vehicle dependency with its proposals for edge of town developments.
- 11/ The LDP fails to explain the impact on Healthcare + Education. The current situation is touched on broadly, but how this will be managed + funded is missing or vague. There is no indication or reference to collaboration with The Hospital Trust, local CCGs or education authorities.

RO1745



St. Helens  
Council

257  
**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD  
**01 MAR 2019**  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: ALLAN JAMES	First name:
Last Name: TRANTER	Last Name:
Organisation/company: [redacted]	Organisation/company:
Address: 43 HAMILTON ROAD GARSWOOD	Address:
Postcode: WN4 0SU.	Postcode:
Tel No: [redacted]	
Mobil: [redacted]	
Email: [redacted]	

Signature: [redacted] Date: 20-2-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA05 1 HA		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Knot justified - the council should be put to strict proof of its population estimates. The population of St Helens has been in decline since 1981, where are all the extra people coming from. One of the purposes of the greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt fails to encourage this. The release of Greenbelt will cause significant harm to the purposes of Greenbelt, Housing in this area isn't sustainable because the lack of school places, doctors surgeries, bus routes and other services. The use of cars is being encouraged because of the lack of facilities. The access to the site on either Billing Road or Gidwood Road would be inadequate, any necessary highways works must be funded by the developer and not the Council Taxpayers.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

**No**, I do not wish to participate at the oral examination

**Yes**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1746



St. Helens  
Council

35 (287)  
St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

05 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: PAULINE	First name:
Last Name: TRAVIS	Last Name:
Organisation/company: N/A	Organisation/company:
Address: 150 TWO BUT LANE RAINHILL	Address:
Postcode: L35 8PT	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted] Date: 4/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:00pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

# Now please complete PART B of this form, setting out your representation/comment.

Please use a separate copy of Part B for each separate comment/representation.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	<b>LPA06</b>	Paragraph / diagram / table	<b>3HS</b>	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	x	Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	<b>Don't Know</b>	<b>Don't Know</b>
Sound?		<b>No X</b>
Complies with the Duty to Cooperate		<b>No X</b>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	X
Justified?	X
Effective?	X
Consistent with National Policy?	X

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments</p> <p>* BROWNFIELD BEFORE GREENBELT, THE REGISTER SHOWS THERE IS POSSIBLE AVAILABILITY FOR AROUND 5000 HOUSES ON BROWNFIELD.</p> <p>* AREA 3HS NATURALLY SEPERATES AT LEAST 3 URBAN AREAS. WITHOUT IT THE AREA WOULD</p>

BECOME ONE MASS URBAN SPRAWL.

\* ZHS IS ALSO A CONFIRMED FLOOD ZONE, TO LOSE THIS WOULD CERTAINLY INCREASE ALL SURROUNDING PROPERTIES RISK OF FLOODING.

\* INFRASTRUCTURE, RESIDENTS ALREADY STRUGGLE WITH DENTIST, DOCTOR, OR SCHOOL PLACES, THE INCREASED POPULATION DUE TO BUILDING MORE HOMES WOULD ONLY MAKE THIS SITUATION WORSE.

\* ROAD INFRASTRUCTURE, THE B AND C ROADS EFFECTED BY BUILDING ON SITE ZHS COULD NOT SUSTAIN THE INCREASE IN TRAFFIC. THE AREA IS ALREADY STRUGGLING NOW.

\* I DO NOT BELIEVE AREA ZHS WOULD BE SAFE LEFT UNDER SAFEGUARDING. THE LOCAL PLAN COULD BE CONTESTED AND THE OWNERS (BUILDERS) CAN PUT FORWARD THEIR PROPOSED PLAN AND BUILD WITHIN 5 YEARS, SO THE IDEA OF SAFEGUARDED TILL 2035 WOULD NOT APPLY

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**The council should delete this land from the proposed removal from the greenbelt, therefore abiding with the National Planning Policy Framework (2019)**

**The council should not consider removing this land from green belt to place in safeguarded**

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	<b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/>	
--------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

I give explicit consent for my name to be used on this form.

3/3/19

PAULINE TRAVIS

MICHAEL TRAVIS

LIAM TRAVIS

GERARD DONNELLY

Eddie Donnelly

Jackie Donnelly

Milly Donnelly

Kate Donnelly

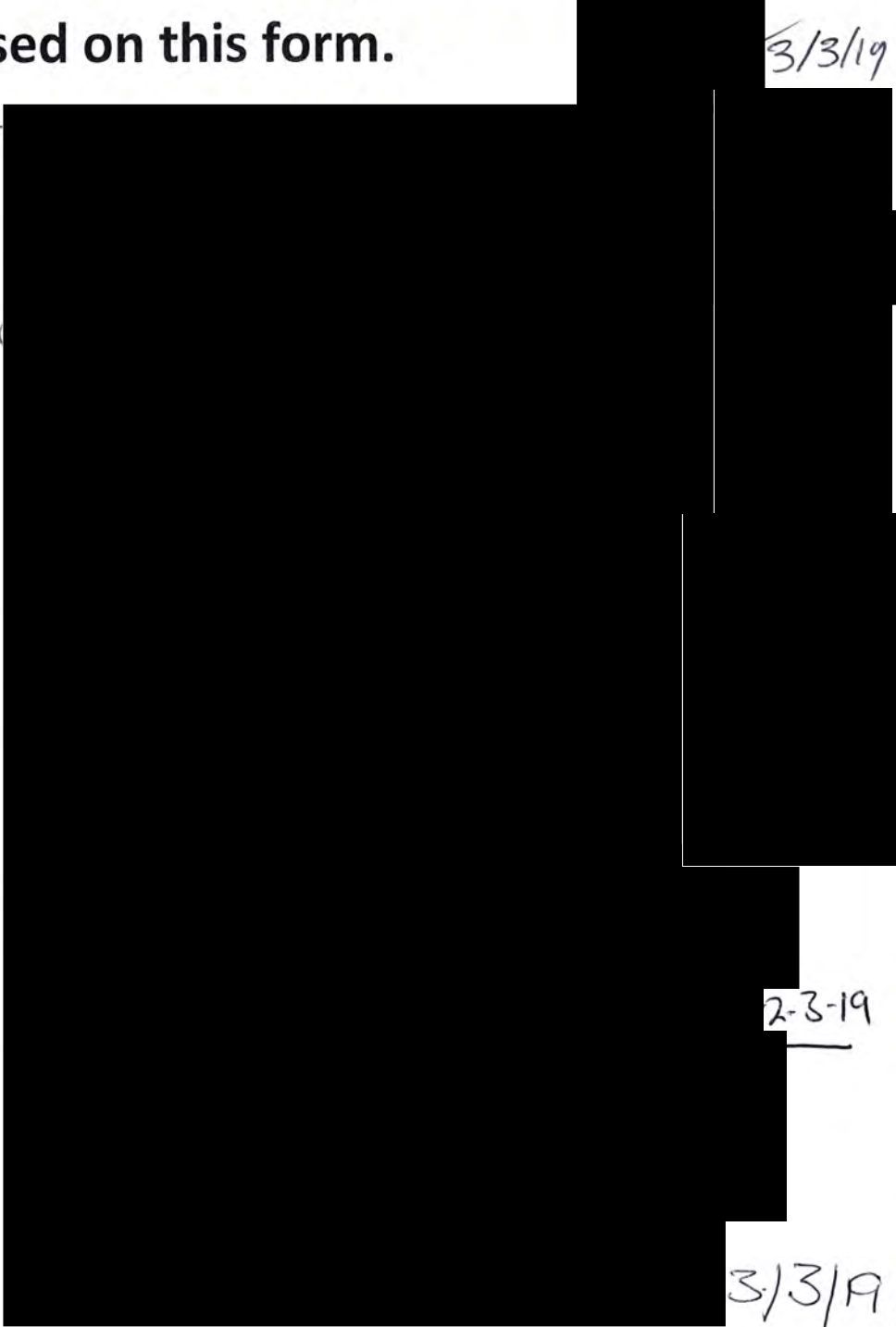
Janni Draycott

Dennis Draycott

Olivia Draycott

Nathan Draycott

Geraldine Berry



2-3-19

3/3/19

We have consulted and worked together on this.

RO1747

376

PFO345



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

11 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>KEVIN</u>	First name: .....
Last Name: <u>TRAVIS</u>	Last Name: .....
Organisation/company: <u>RETIRED</u>	Organisation/company: .....
Address: <u>438A LIVERPOOL RD, HAYDOCK, STHELENS, MERSEYSIDE.</u>	Address: .....
Postcode: <u>W11-9RP</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: <u>NONE</u>	Email: .....

Signature: [REDACTED] Date: 4-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. NOTED.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA 05 SITE 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

WANTING TO USE MORE 'GREENBELT' FOR MORE DEVELOPMENT WHICH IN TURN WILL MEAN MORE TRAFFIC, POLLUTION, NOISE TO OFTEN GRIDLOCK THE A58, WHICH WAS ONLY A COUNTRY LANE (RESIDENT SINCE 1966). SINCE THE M6 ENTRY GOING NORTH AT JUNCTION 24 THE TRAFFIC (ALL SORTS) AS INCREASED ENORMOUSLY. THIS IN MY SITUATION (40 METRES FROM TRAFFIC AT EASTLANC9 ROAD) AT PEAK TIMES IS MOST DANGEROUS. TRYING TO LEAVE CALDAY GROVE HAVING TO COPE WITH 5 STREAMS OF MOVING TRAFFIC - FROM MANCHESTER, LIVERPOOL (BLIND) B/BROOK e2 FROM ASHTON. CONFIRMED BY CAR ACCIDENT APR 18, SERIOUS DAMAGE TO MY CAR (REPAIRERS KARL VELLA - SKELMERSDALE) NOMINATED BY L.V INSURANCE.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

377

Pf346

Ref: LPSD

11 MAR 2019

(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>KEVIN</u>	First name: .....
Last Name: <u>TRANIS</u>	Last Name: .....
Organisation/company: <u>RETIRED.</u>	Organisation/company: .....
Address: <u>438A LIVERPOOL RD HAYDOCK, ST. HELENS MERSEYSIDE.</u>	Address: .....
Postcode: <u>W11 - 9 RP.</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED] Date: 7-3-19.

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

### Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address. NOTED.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 SITES 2EA 5EA 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No ?
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>WITH ALL THE DEVELOPMENT, ON GOING AND PROPOSED, WILL MOST CERTAINLY MAKE IT DIFFICULT TO COMPLY, DOCTORS, SCHOOLS, HOUSING PRICES, TRANSPORT, AMBULANCES VERY FREQUENT TO ACCIDENTS ON M6, FIRE BRIGADE - POLLUTION. H.G.W's BOTH GOING TO eFROM6 CONSTANTLY. HAYDOCK IS NOW KNOW AS THE LAND OF CONTAINERS, WITH ALL THE LOSS OF GREENBELT AN THE DOMINANCE OF CONCRETE, SURELY FLOODING PROBLEMS WILL FOLLOW.</p>

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally, compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1748



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: WESLEY	First name:
Last Name: TRAVIS	Last Name:
Organisation/company:	Organisation/company:
Address: 40 CRAWFORD ST CLOCK FACE ST. HELENS MERSEYSIDE	Address:
Postcode: WA9 4XH	Postcode:
[REDACTED]	Tel No:
[REDACTED]	Mobile No:
[REDACTED]	Email:

Signature: [REDACTED] Date: 11-3-19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes  (Via Email) No



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us by no later than **5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:                               **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to:       Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to:                    [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:**                               [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:**                       01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

RO1749



St Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: FRANK	First name:
Last Name: TRAVIS	Last Name:
Organisation/company:	Organisation/company:
Address: 40 CRAWFORD ST CLOCK FACE, ST. HELENS MERSEYSIDE	Address:
Postcode: WA9 4XH	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

RO1750



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

13 MAY 2019  
1168

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Barry	First name:
Last Name: Travis	Last Name:
Organisation/company:	Organisation/company:
Address: 40 Crawford Street Clock Face, St Helens	Address:
Postcode:	Postcode:
Tel No: 01744 817046	Tel No:
Mobile No: /	Mobile No:
	mail:

Signature: [Redacted] Date: 11-3-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments:

in line with bold and ClockFace action group.



7. Please set out what modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness. (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

<input type="checkbox"/> <b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination

--	--

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1751

EFO022  
SITE 2EA



Representation Forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:53  
Hide Details

① - LPA04  
② - PARA 1.7.2  
DEC



3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from [Mail](#) for Windows 10

EFO022

① - LPA04  
② - PARA 1.7.2  
DEC

SITE 2EA

Ref: LPSD  
  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Travnor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive Garswood	Address: .....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 2EA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</b>	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	<div style="border-left: 1px solid black; padding-left: 5px;"> <p>①</p> <p>②</p> <p>①</p> </div>
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

EFO023

SITE 5EA



Representation Forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:53  
Hide Details

① - LPA04  
② - PARA 1.7.2  
DEC



3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from [Mail](#) for Windows 10



① - LPA04  
② - PARA 1-7.2  
DEC

EFO023  
SITE 5EA



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[REDACTED]	Tel No: .....
[REDACTED]	Mobile No: .....
[REDACTED]	Email: .....

Signature: [REDACTED] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 5EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	} ①
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	} ②
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	} ①

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

EFO024

SITE 6EA

① - LPA04

② - PARA 1-7.2  
DEC



Representation Forms

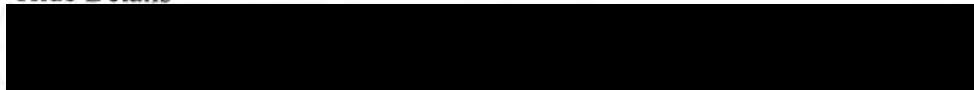
Barbara

to:

planningpolicy@sthelens.gov.uk

11/03/2019 16:53

Hide Details



3 Attachments

PDF



St Helens Comment form LPA04 2EA FFarm South WHouse BT.pdf

PDF



St Helens Comment form LPA04 5EA FFarm South WHouse BT.pdf

PDF



St Helens Comment form LPA04 6EA FFarm South WHouse BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards

Barbara

Sent from Mail for Windows 10

① - LPA04  
② - PARA 1.7.2  
DEC

EFO024  
SITE 6EA

Ref: LPSD  
  
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u> If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to <u>set out your comments.</u>
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.
There is no statement of common ground with other Authorities
The release of Greenbelt will cause significant harm to the purpose of Greenbelt
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook

Please continue on a separate sheet if necessary



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

EF0025

SITE IHA

① - LPA05

② - PARA 1.7.2  
DTC



Representation forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:54  
Hide Details



3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



St Helens Comment form LPA05-1HS smocklane BT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from Mail for Windows 10

① - LPA05

EFO025

② - PARx 1.7.2.

SITE 1HA

DEC.

Ref: LPSD
(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted]	Date: 20 Feb 2019
-----------------------	-------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)                       No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	<div style="border-left: 1px solid black; border-right: 1px solid black; padding-left: 5px;"> <p style="text-align: right;">①</p> <p style="text-align: right;">②</p> <p style="text-align: right;">①</p> </div>
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

EFO026

SITE IHS



Representation forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:54  
Hide Details

① -LPA06  
② PAR 1.72  
DCL



3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



St Helens Comment form LPA05-1HS smocklane BT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from [Mail](#) for Windows 10

① - LPA06  
② - PARA 1.7.2  
DLC

EFO026  
Site IHS



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mrs	Title: .....
First Name: Barbara	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

①

②

①

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

EFO027

SITE 2HA



Representation forms  
Barbara  
to:  
planningpolicy@sthelens.gov.uk  
11/03/2019 16:54  
Hide Details

① - LPA OK  
② - PAX 1.72  
DEC



3 Attachments



St Helens Comment form LPA05-1HA safeguarded BT.pdf



St Helens Comment form LPA05-1HS smocklane BT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing BT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
Barbara

Sent from [Mail](#) for Windows 10

① - LPA05  
② - PARA 1.7.2  
Dec.

EF0027  
SITE 2HA



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

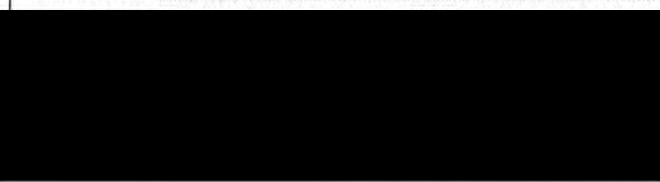
This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: .....
First Name: <u>Barbara</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>24 Oban Drive</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0SJ</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 2HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<p><b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

①  
②  
①

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1752

EFO092



{In Archive} Representation Form  
David Traynor  
to:  
planningpolicy  
21/02/2019 10:59

SHKS 2EA, 5EA, 6EA

① LPA04

② para 1.7.2.



3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse DT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse DT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse DT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
D Traynor



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

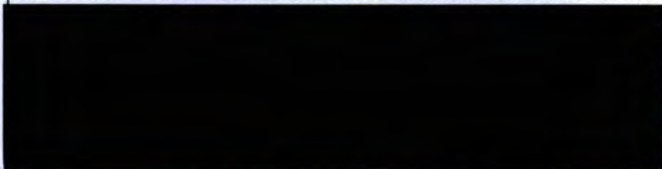
This form has two parts;

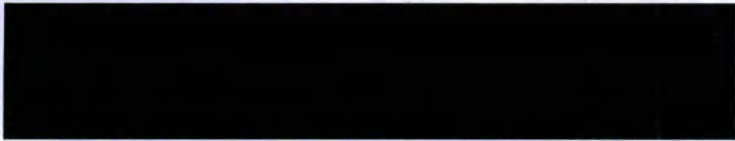
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>David</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>24 Oban Drive</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0SJ</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: 	Date: <u>20 Feb 2019</u>
---	--------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 2EA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out your comments.</u>	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	<div style="border-left: 1px solid black; padding-left: 10px;"> <p>①</p> <p>②</p> <p>①</p> </div>
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>David</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>24 Oban Drive</u>	Address: .....
<u>Garswood</u>	.....
Postcode: <u>WN4 0SJ</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted]	Date: <u>20 Feb 2019</u>
-----------------------	--------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 SEA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	] ①
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	] ②
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	] ①

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>David</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>24 Oban Drive</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0SJ</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	<div style="border-left: 1px solid black; border-right: 1px solid black; padding-left: 5px;"> <p>①</p> <p>②</p> <p>①</p> </div>
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

EF0093



{In Archive} Representation forms  
David Traynor  
to:  
planningpolicy  
21/02/2019 11:00

Stns 1HA, 1HS  
+ 2HA

- ① Policy LPA05
- ② Para 1.7-2
- ③ LPA06



3 Attachments



St Helens Comment form LPA05-1HA safeguarded DT.pdf



St Helens Comment form LPA05-1HS smocklane DT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing DT.pdf

Please find attached 3 representation forms for the St Helens Borough Local Plan 2020-2035

Regards  
D Traynor



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title: .....
First Name: David	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive	Address: .....
Garswood	.....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)
- No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	} ① } ② } ①
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination.	Yes, I wish to participate at the oral examination
---	---	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

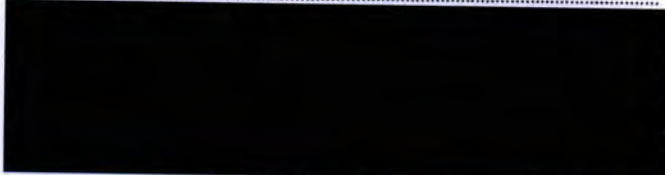
This form has two parts;


**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>David</u>	First name: _____
Last Name: <u>Traynor</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>24 Oban Drive</u>	Address: _____
<u>Garswood</u>	_____
Postcode: <u>WN4 0SJ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<p><b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b></p> <p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

③ - LPA06  
②  
③

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
---	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title: .....
First Name: David	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 24 Oban Drive Garswood	Address: .....
Postcode: WN4 0SJ	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted]	Date: 20 Feb 2019
-----------------------	-------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA05 2HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	] 0 ] 2 ] 0
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1753

EFO095

SITES - 2EA, 5EA, 6EA  
114, 115 + 214



{In Archive} Representation forms  
Luke Traynor  
to:  
planningpolicy@sthelens.gov.uk  
21/02/2019 20:27



- ① LPA04
- ② PARA 1.7.2
- ③ LPA05
- ④ LPA06

3 Attachments



St Helens Comment form LPA04 2EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 5EA FFarm South WHouse LT.pdf



St Helens Comment form LPA04 6EA FFarm South WHouse LT.pdf

Please find attached 3 of 6 representation forms

Luke Traynor

Sent from Mail for Windows 10



{In Archive} Representation forms  
Luke Traynor  
to:  
planningpolicy@sthelens.gov.uk  
21/02/2019 20:28



3 Attachments



St Helens Comment form LPA05-1HA safeguarded LT.pdf



St Helens Comment form LPA05-1HS smocklane LT.pdf



St Helens Comment form LPA05-2HA FFarm South Housing LT.pdf

Please find attached 3 of 6 representation forms

Regards Luke Traynor

Sent from Mail for Windows 10



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>Luke</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>192 Victoria Road</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0RG</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted]	Date: <u>20 Feb 2019</u>
-----------------------	--------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA04 2EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
---	--	--------------------------	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

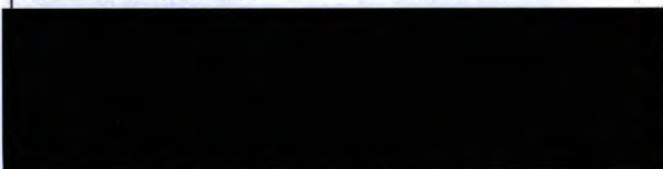
This form has two parts;


**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>Luke</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>192 Victoria Road</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0RG</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 5EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</b>	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	<div style="border-left: 1px solid black; padding-left: 5px;"> <p>①</p> <p>②</p> <p>③</p> </div>
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

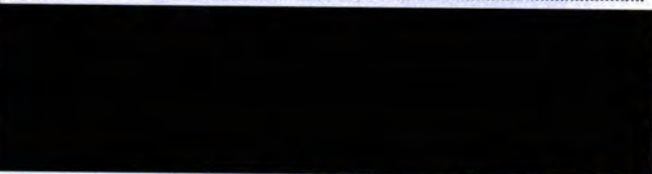
This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: .....
First Name: <u>Luke</u>	First name: .....
Last Name: <u>Traynor</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>192 Victoria Road</u> <u>Garswood</u>	Address: .....
Postcode: <u>WN4 0RG</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature:  Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA04 6EA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
Not justified – The council should put strict proof on their population estimates – St Helens population has been in decline since 1981 – where are the extra people coming from?	} ① } ② } ①
The access to the site is inadequate and potentially dangerous having only a left in/left out from the A580. There is no doubt that Heavy goods vehicles will cause extra burden on Liverpool Road and Millfield Lane to access to/from the M6 at J24.	
There is no statement of common ground with other Authorities	
The release of Greenbelt will cause significant harm to the purpose of Greenbelt	
There are existing flooding problems at this site, any remedies to prevent this would place even greater amounts of water into the Clipsey Brook	

Please continue on a separate sheet if necessary

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Luke

Last Name: Traynor

Organisation/company:

Address: 192 Victoria Road

Garswood

Postcode: WN4 0RG



### 2. Your Agent's Details (if applicable)

Title:

First name:

Last Name:

Organisation/company:

Address:

Postcode:

Tel No:

Mobile No:

Email:

Signature:



Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
If you wish to <u>support the legal compliance or soundness of the Local Plan</u> , please also use this box to set out your comments.	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

### 1. Your Details

(we will correspond via your agent)

Title: Mr

First Name: Luke

Last Name: Traynor

Organisation/company: \_\_\_\_\_

Address: 192 Victoria Road

Garswood

Postcode: WN4 0RG

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:  
post to:

Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 1HS	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
<p>The release of Greenbelt land causes significant harm to the purpose of the Greenbelt</p> <p>The council needs to prove its population estimates as the population of St Helens has been declining since 1981</p> <p>Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services</p> <p>There is no statement of common ground with neighbouring Authorities</p> <p>One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this</p>	

4  
2  
4

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

✓	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: Mr	Title: .....
First Name: Luke	First name: .....
Last Name: Traynor	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: 192 Victoria Road Garswood	Address: .....
Postcode: WN4 0RG	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 20 Feb 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA05 2HA	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>	
<b>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</b>	
The release of Greenbelt land causes significant harm to the purpose of the Greenbelt	<div style="border: 1px solid black; padding: 5px; display: inline-block;">3</div> <div style="border: 1px solid black; padding: 5px; display: inline-block;">2</div> <div style="border: 1px solid black; padding: 5px; display: inline-block;">1</div>
The council needs to prove its population estimates as the population of St Helens has been declining since 1981	
Housing in Garswood is NOT sustainable because of the lack of school places, doctors surgeries, bus routes and other services	
There is no statement of common ground with neighbouring Authorities	
One of the reasons for having Greenbelt is to assist with urban regeneration by encouraging recycling of derelict and other urban land. Using Greenbelt fails to encourage this	

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1754

330

Ref: LPSD

07 MAR 2019

(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>GRAHAM</u>	First name: _____
Last Name: <u>TRAYNOR</u>	Last Name: _____
Organisation/company: _____ [REDACTED]	Organisation/company: _____
Address: _____ <u>226 DENTONS GREEN</u> <u>LANE</u>	Address: _____
Postcode: <u>WA10 6RT</u>	Postcode: _____
Tel No: _____ [REDACTED]	Tel No: _____
Mobile No: _____ [REDACTED]	Mobile No: _____
Email: _____ [REDACTED]	Email: _____

Signature: _____ [REDACTED]	Date: <u>06/03/19</u>
--------------------------------	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)                       No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed assumptions - no
Effective?	<input checked="" type="checkbox"/> No - not delineable.
Consistent with National Policy?	<input checked="" type="checkbox"/> Does not comply with national policy

6. Please give details of why you consider the Local Plan is <u>not legally compliant</u> or is <u>unsound</u> or fails to comply with the duty to cooperate. Please be as precise as possible.
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p> <p>The plan will result in worse congestion. more dangerous levels of air pollution and increased risk of surface water flooding. These costs are extracted after development and not appear in initial assessment. The greenbelt is critical green infrastructure provides space for farming, protection from flooding, improves air quality and enables recreation.</p>

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Build affordable housing in the town centre. Help build a town centre that people will visit not a satellite town outside St Helens. Reclaim brownfield land

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No, I do not wish to participate at the oral examination

X

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As a resident of the local area and having been born in St Helens I feel I have insight into the proposal.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1755



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

200

Ref: LPSD  
01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

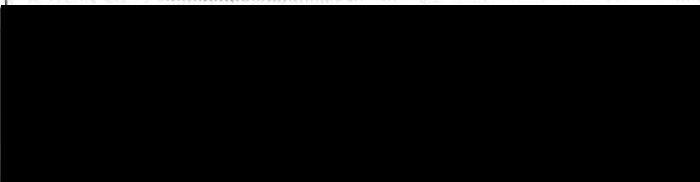
This form has two parts;

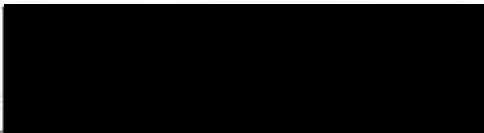
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>LEONARD</u>	First name: _____
Last Name: <u>TAIGG</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>51. VICARAGE DRIVE</u>	Address: _____
<u>HAYDOCK ST HELENS</u>	_____
<u>MERSEYSIDE.</u>	_____
Postcode: <u>W11 0UG</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 25-02-2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>LAOS</i> <i>2HA</i>		Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<i>DONT KNOW</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<i>One of the purposes of the Greenbelt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Using Greenbelt to encourage this, also the release of Greenbelt will cause significant harm to the purposes of the Greenbelt and high volumes of predicted traffic will add to the already over capacity on junction 23 of the M6.</i>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete this land from the proposed removal from the Greenbelt.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



RO1756



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

204

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>JENNIFER</u>	First name: .....
Last Name: <u>TRIGG</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>51 VICARAGE DRIVE,</u> <u>HAYDOCK, ST. HELENS</u> <u>MERSEYSIDE</u>	Address: .....
Postcode: <u>W11 0UR</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 25.2.2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LAOS 2 HA		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:			
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness			
Legally Compliant?	DON'T KNOW	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>THE RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO THE PURPOSES OF THE GREENBELT.</p> <p>HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF THE LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES, BUS ROUTES AND OTHER SERVICES, MORE CARS ON THE ROAD AND LARGELY H.V.'S. DAY &amp; NIGHT.</p> <p>THE ACCESS TO THE SITE IS INADEQUATE, A LEFT IN/LEFT OUT FROM THE EAST LANCASHIRE ROAD ISN'T SAFE AND THE PROPOSAL FOR A JUNCTION AT LIVERPOOL ROAD &amp; VICARAGE ROAD WOULD PUT ADDITIONAL TRAFFIC ON AN ALREADY OVERSTRUCTURED HIGHWAYS-SYSTEM. ALSO FLOODING PROBLEMS @ CLIPSEY BROOK.</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM THE PROPOSED REMOVAL FROM THE GREEN BELT.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

✓	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1757

13 MAR 2019

Ref: LPSD

(For official use only)



# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

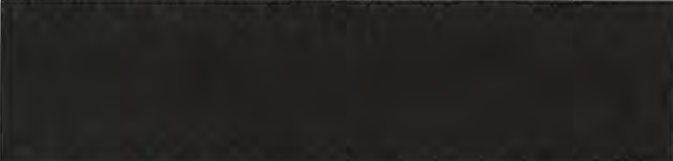
This form has two parts:

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>GAYNOR</u>	First name: .....
Last Name: <u>TROTTER</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>40 Consfield Street</u> <u>St Helens</u>	Address: .....
Postcode: <u>WA10 1LY</u>	Postcode: .....
	Tel No: .....
	Mobile No: .....
	Email: .....

Signature: 	Date: <u>12/03/19</u>
--	-----------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
IHA LPAS		SMOCKLANE					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>Food Security</p> <p>Doctors / Dentist / School</p>

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Delete IAN0 from remainder  
of greenbelt 1C

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

/	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	Paragraph/ diagram/ table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment
IH5 LPAD06		Billings Ro					
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>	
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.	
<p>Urban Sprawl</p> <p>Travle Congestion</p>	

(2)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete IAN from removal of  
greenbelt

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1758



St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;

Part A – Personal Details

Part B – Your Representation(s).

1061

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>ms</i>	Title:
First Name: <i>Jennifer</i>	First name:
Last Name: <i>Tuddenham</i>	Last Name:
Organisation/company: <i>Rutland House Vets</i>	Organisation/company:
Address: <i>10 Acanthus Road Liverpool</i>	Address:
Postcode: <i>L13 3DX</i>	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted] Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1759



5201  
①-LPAOS ②-Statement of Common Ground  
③-LPAOS ④-Statement of Common Ground

13 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD  
  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: CHRISTOPHER	First name:
Last Name: TULLY	Last Name:
Organisation/company:	Organisation/company:
Address: 3918 GARBWOOD A	Address:
Postcode: WN4 0TZ	Postcode:
	Tel No:
	Mobile No:
	Email:
Signature: [Redacted]	Date: 10.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No



Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us by no later than **5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St. Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy  <i>LPADS</i>	Paragraph / diagram / table		Policies Map	<i>117A</i>	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the <u>St Helens Borough Local Plan 2020-2035</u> is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, this is due to local people living on the estate, Doctor's surgeries, bus routes, parking at the train station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Garswood Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

N.B. The number of children with asthma is increasing due to pollution and [REDACTED]

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Lancs at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

## Please use a separate copy of Part B for each separate comment/representation.

### PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map	115	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Not justified-the council should be put to strict proof of it's population estimates, as the population of St Helens has declined since 1981. Where are all the extra people coming from? One of the purposes of the Green Belt is to assist in urban regeneration by encouraging the recycling of of derelict and other land. Using Green Belt does not do this. Release of Green Belt will cause significant harm to the purposes of the Green Belt.Houses in this area is not sustainable due to the lack of school places, there will need to be a school built on the new estate as the school run on the estate is very chaotic, with cars parked around the school

causing an obstruction to all road users, Doctor's surgeries, bus routes, parking at the train Station is limited and people from the estate, who use the train are parking in Strange Road, School Lane, Station Road and Victoria Road, leaving their cars all day while they use the train. This causes obstruction for buses and other traffic. The use of cars is being encouraged due to lack of facilities. The access to the site on either Billinge Road/Leyland Green Road is not adequate due to narrow road and lack of pavements. Also the amount of traffic already using these roads is increasing. There are a lot of walkers and it is getting really bad crossing these roads due to the increased amount of traffic. Any necessary highways work must be funded by the developer and not the council tax payer. There is no statement of common ground.

N.B. The number of children with asthma is increasing due to pollution and

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Due to pollution and extra traffic coming from the new development would it not be better to spread the houses creating villages instead of estates, there is plenty of land? Also, there is two plots of land in Billinge Road where houses have been pulled down. There is also two on Leyland Green Road. Look for other plots as we need the Green Belt for farming. There is a wide road from Billinge to the East Cants at Carr Mill, Birchley Road/Carr Mill Road. In addition, there is a railway station in Orrell with a bus service from St Helens to Wigan through Orrell every fifteen minutes. Would it help if you use incentives for builders to use brown land, eg free planning permission?

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representative has made a modification, do you consider it necessary to participate at the oral part of the examination (this hearing is public)?

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

--

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination**

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1760

983

44 The Parchments  
Newton-le-Willows  
WA12 0DY

10 MAY 2019

May 2019

Dear Sirs

Re: Objections to Revised Local Plan, Revised Parkside Link Road (PLR) Planning Application and Parkside Phase 1 Planning Application

Please find enclosed our comments on the above, which has been the subject of public consultation.

Our comments remain pretty much as those submitted to you on the draft local plan in January 2017 and therefore we reattach our comments plus those which relate to the Parkside planning application. Would you please regard these objectives to also relate to the Revised Parkside Link Road Planning Application.

Although some housing land has been deleted and other housing and industrial sites have been put into the medium term, the council still seems to be removing land from the green belt, not concentrating sufficiently on a brownfield first strategy and has in no way adequately take into account the cumulative effects of all these developments on the borough, its residents, their wellbeing and the environment.

By way of example, since 2017 the traffic congestion and increase in lorries along the A49 has been most noticeable; local roads are already very congested. There must be increased pollution and detriment to our rightful expectation of enjoying a safe and sustainable living environment. The identification of greenfield and other sites in the medium term has opened the door for landowners and developers to push and continue to press for development on productive agricultural and green belt land.

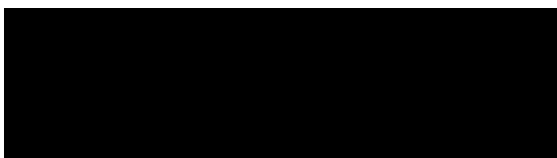
Junction 23 of the M6 where the A580 and A49 feed in to and out from the motorway and into the local road network, has been identified nationally as one of the locations where traffic problems have become worse since so called improvements have taken place in recent years. The prospects of not only more and more lorries pouring onto the A580 from Florida Farm and land at Haydock adjacent to the M6, is going to make Haydock Island at J23 even more congested. Lorries will seek to find alternative routes on local roads including the A49 through Newton. This, combined with Parkside proposals for warehousing and increased residential development, will make the situation unsustainable.

The plan is predicated on increased rates to the council's coffers rather than the wellbeing of the residents of St Helens.

If the world push is to reduce the environmental impact of new development, St Helens seems to be going in the opposite direction. The local paper cites the council as saying there are 3 new major logistics developments proposed for the borough, these will bring low level jobs, high levels of traffic generation adding to local congestion and increased pollution.

Warehouses are not positive icons for the borough or the way to achieve a sustainable St Helens. This local plan is a bad plan

Yours Faithfully



Mr & Mrs Richard Tully  
2 encs



44 The Parchments  
Newton-le-Willows  
WA12 0DY

5<sup>th</sup> February 2019

Dear Sirs

Re: Parkside Planning Application P/2018/0048/OUP

We write as residents of Newton-le-Willows to object to the current planning application for warehousing and distribution at Parkside.

The application flies in the face of the original rationale put forward for development of the site as the location for a strategic rail freight facility designed to take lorry traffic off the roads locally and nationally.

The current application for warehousing is of a scale and scope that will create significant and harmful large vehicular movements into and out of the site, adversely affecting the local roads, environment, air quality and safety of residents of Newton-le-Willows. It will also throw large amounts of traffic onto the M6 motorway at junction 22 and up to junction 23 where major congestion already exists and many accidents occur. It impacts on traffic generation on local roads including and especially the A49 through Newton-le-Willows and surrounding lanes.

One only has to look at the scale and dominance of the recent warehousing developments permitted by St Helens council at Florida Farm and just north of junction 23 of the M6, to see how inappropriate the current proposals are at Parkside.

Florida Farm development (currently advertising over 500,000 sq ft of space available from June) and the junction 23 scheme demonstrate what an overwhelming impact such a development will have on local roads environment air quality and safety of borough residents, let alone the scale of additional traffic that they will generate to further clog up the A580, Haydock island, M6 and local roads, when seeking the easiest and quickest way out of the area. There is also extensive warehousing and further development at the nearby Omega site just south of Parkside; is it a coincidence that St Helens council have raised no objections to further development at North Omega when seeking to facilitate developments at Parkside?

The current planning application at Parkside, and the others mentioned above, seem to be being considered in isolation to each other, unfortunately without any consideration as to the cumulative effect they will all have on traffic congestion, environmental degradation, air quality and safety.

There is also the question of St Helens involvement with the Parkside site, financially and as a partner to prospective development. The council cannot be impartial as the local planning authority in considering the application whilst it is a linked partner.

The council is also promoting a link road to and from the site, including access from the A49 across to Winwick Lane and on to junction 22 of the M6. The council must be aware of the weight restriction on Winwick Lane of 7.5 tonnes for vehicles, so where will the traffic go? When it needs to it will go onto the A49 through Newton, Southworth Road and surrounding Winwick roads.

The link road promoted by the council is a Trojan horse for unwanted and unwarranted warehousing, rather than the strategic objective of creating a rail freight depot designed to minimise or eradicate most of the adverse impact and effects that the current application under consideration delivers in spades.

Finally, where are the aspirational jobs and careers to which our young people can aspire? Where will their futures lead? Certainly nowhere in St Helens if this fixation with warehousing as the way to improve our borough carries on. Technology is outstripping jobs, even warehouse ones, computer tagged items, along with computer operated fork lift trucks is already here and a large company in Wigan requires only 2 people per shift to run it. Our bright young residents will leave the borough to find satisfying and well paid work elsewhere and those who are unable to do this will be left in a town with little prospect of a good life with good pay and good chances of promotion, not to mention our ignored 'sickest town' label. We moved 30 years ago to a town that was going to build itself into a place where people wanted to come, live and work but somewhere along the way someone lost the plot and now we have the prospect of a borough full of tin sheds and pollution.

Warehousing is hardly a cultural icon for the future.

Please register our 2 further objections to this current planning application.

Yours faithfully

Richard and Christine Tully

44 The Parchments  
Newton-le-Willows  
WA12 0DY

05/03/2018

Dear Mr Kilroe

Re: Planning Application - P/2018/0048/OUP Parkside Planning Application

We make our objections as residents of Newton-le-Willows, living just off the A49.

The planning application as submitted is for another warehouse development, it cannot be judged in isolation to other developments such as warehousing at Florida Farm North, now under construction, plans mooted by Peels Holdings at Haydock Island, existing warehousing and other industrial developments in the local area, producing evermore traffic, pollution and congestion in the locality. Proposed housing developments will add to levels of congestion to be endured by local residents and the totality of all such proposals as set out in the local plan do not seem to have been considered in full.

The current proposal for warehousing at Parkside is not the strategic rail freight scheme that has been subject to scrutiny in the past and which was the justification for the Parkside site to be taken out of the greenbelt. It is for a further 92900 m2 of traffic generating development covering the greenbelt.

The A49 is already congested and often comes to a standstill. Existing traffic levels require air pollution monitoring on the High Street and at Southworth Road. Many borough residents already suffer health problems; increased traffic levels, pollution and fumes will only add to those problems. Logistic jobs are not high quality or aspirational and the borough's secondary education provision serves students poorly. The jobs in prospect from warehousing will not help further aspiration in the next generation. Indeed, Parkside is at the edge of the borough and people will travel in from elsewhere, adding to traffic congestion in the surrounding area.

From the public consultations and planning application the prospect of alternative routes to and from the site seem not to be conjoined. The local authority would appear to be seeking to produce an alternative route and not the developer, it is clear that if the development goes ahead for 92900 m2 of warehousing, it is the A49 that will be the primary route for vehicles until or unless the council can procure an alternative. The council is however a joint partner of the Parkside site and as such cannot be seen as divorced from the planning application, let alone the cost of providing such a route when it is proposing cuts across the board and increasing council tax.

In addition, two articles in The St Helens Star - 01/03/2018 - caught our attention. The first provides an example of how construction traffic and large lorries disrupt residential areas by doing u-turns in residential streets. The second with new jobs to Haydock is actually for a company to occupy existing vacant space, not new build. The relevance is that traffic congestion on the A49 and local roads will increase; construction and HGV traffic pleases itself not local people or plans. There exists vacant industrial space and locations in the borough which should be occupied to give new jobs rather than speculative, new, large sheds built in the green belt. It does not add positively to the health and wellbeing of the borough and its residents.

Will you please register our objections to the planning application as submitted

Yours sincerely

Mr and Mrs Tully

10 MAY 2019

We are residents of Newton-le-Willow and will therefore make our site specific comments on the range of sites identified locally to us for employment and housing.

We do, however, have some more general comments about the plan which, overall, questions its soundness of approach to the conclusions it reaches about identifying sites in Newton and elsewhere across the borough and for taking large areas of the greenbelt out of productive agricultural use.

The plan is predicated on growth but doesn't take into any account the cost of growth. There is no impact assessment for any site which generates housing, traffic, noise, pollution and/or large tin sheds employing very few people. The infrastructure requirements are not addressed, nor the ability of the local areas to absorb, deal or sustain them. There are not traffic plans, no road improvements, no air quality or other environmental impact assessments. The council seems to expect these all to be done on a site by site basis without an assessment - or prediction - of the cumulative impacts of such a scale of new development. No cost / benefits are examined by the council who are already facing further cuts financially and who are already telling its population that it will have to cut services further and/or not provide them at all. - See St Helens Star advert taken out by the council in the paper 25th January 2017 and St Helens First magazine delivered to our house yesterday (29<sup>th</sup> January 2017). If the council can't provide the services needed to the existing population into the future, how will it provide them to 8000 plus new homes and families and how will the vast amount of warehousing actually deliver more income than is needed to sustain the costs of such an increase in needs?

The take of Greenbelt land has no consideration of current agricultural, food producing use and value previously, now and into the future. The need to have productive farming land for an ever increasing population cannot be assisted by taking out swathes of farming greenbelt across St Helens, or elsewhere for that matter.

The whole plan is, it would appear, based on the council's economic needs to generate new funding for services it admits it cannot provide sufficiently well or long enough for its current population and overall wellbeing of the borough. Having to generate funding locally to provide services impacts on St Helens Council and council's elsewhere. The cost of providing such services to 177000 people is already known, but the plan doesn't demonstrate that taking such large amounts of productive land out of the greenbelt and covering it with houses and warehouses generates less future demand for the council than it creates for the current and future needs of the existing and future population. The cost of maintaining the roads, providing new infrastructure including schools, gp surgeries etc and sustaining them is not even considered in the plan.

The recent Strategic Housing Land Availability Assessment suggested there is sufficient housing land available up until 2022, so why take out and safeguard so much land to 2033 now? It is understood that developers will seek the easiest sites to develop so what is to stop them from swooping in on the greenbelt opposed to the councils successful policy of dealing with the ongoing amount of brownfield sites and derelict land. There are many good examples of this success across the borough, there remain many brownfield sites still to deal with. It is not sufficient in land use planning to replace difficult to develop sites with the cheaper greenbelt land provision and not address what needs to be done with the existing (and with this plan continuing) derelict and despoiled land. The current approach diminishes the former novel and creative ways by which St Helens has improved its land and the land owned by the private sector.

It needs a fresh approach, clearly it does, if it is to attain the 2020 Vision for a prosperous borough. Taking out the greenbelt and filling it up with acres of tin sheds that join one area with another and letting houses be built which spread one local area into the next will not bring lasting prosperity to St Helens.

Our site specific comments relate to Newton-le-Willows and the local area.

Parkside proposals as set out by Langtree are for warehousing on one part of the site only. There is no rail freight provision as set out in the Core Strategy and as examined and reported on by the inspector. The Draft Local Plan now shows and Langtree are promoting, a warehousing scheme that relies on lorry borne traffic using the A49. This was never the plan, so why is it now acceptable when previously it was not? The A49 is already congested and often comes to a standstill through the High Street and as far as Winwick traffic lights, which are outside the borough's control. The Winwick/Junction 22 of the M6 and link to the M62 north of Warrington is already at capacity in the morning/evening rush hours. How can more lorry traffic help to reduce the problem on the A49 and surrounding junction? Do neighbouring areas and Warrington in particular want lorries from Parkside making things worse, even allowing for the junction improvements to which Langtree will obviously have to contribute.

If diesel fumes from idling vehicles is the problem we are told it is, it will only get worse with lorries from Parkside on the A49 and through the High Street - where we already have an air pollution measurement in place. The justification for taking Parkside out of the greenbelt was that it provide the solution to help take vehicles off the road when it was developed. This proposal from Langtree (and one suspects the council as joint owners of the site) does the complete opposite. Langtree doesn't own the remaining Parkside land on the east of the M6. It cannot deliver the larger, previously mooted scheme any more than the former owners who walked away from the development. It is faced now with trying to get the site fronting onto the A49 out of the greenbelt at the same time as Peel Holdings want to develop land at Haydock and the council has permitted warehousing at Florida Farm North. Both these other sites will impact the road system dramatically; both will put lorries onto the A580, the Haydock island, the M6 and the A49, as they seek the shortest 'sat nav' route and avoid the motorway congestion through Newton. It already happens when the motorway is at a standstill and the Langtree proposal will be putting more traffic directly onto the A49.

The £2.2 million contribution annually to the business rates St Helens can keep has not been measured against the impact the development will have on Newton and the surrounding roads and communities. The development is at the edge of the borough and people will travel in to work at it from outside the St Helens. They certainly won't want to travel by bus into the centre of St Helens and then out again to Newton, they will come by car. The jobs that will be created will be low grade, shift work and transient. They will not be jobs created by St Helens businesses and will therefore be at the whim of the large national concerns who will use the space as, and until, it is no longer needed. The jobs will go but the shed will remain. If sustainable economic development is a requirement for and by St Helens, then this proposal isn't it, as currently in the Draft Local Plan.

The housing site allocation has no real justification.

The land take at Lawsons Farm and then The Elms Farm and behind the Parchments to Castle Hill and down to the Lake follows the line set by the Hope Academy development. The school had to be set back because of pollution levels from the M6. The motorway is busier now than ever and other developments in the draft local plan will make it even worse. Has anyone looked into the predicted pollution levels from development elsewhere to accurately predict such a line on a map, let alone considered the visual effect of taking land at Castle Hill, which currently provides the open view of the lake and its setting, including the Conservation Area? The housing takes currently productive farmland out of use and it puts more traffic onto the A49 and Rob Lane and the stub of road at Castle Hill. It is difficult at times to get off the Parchments onto the High Street because of the current volume of traffic. It is also already congested with commuter parking with people who leave their cars all day and travel by train.

The same can be said for the housing proposed west of Ashton Road. This site goes right up to the A580. It puts more traffic onto the A49 and A580/Haydock Island. It takes farming land out of productive use. There is no impact assessment as to the need and the provision of infrastructure, including GP surgeries and primary schools, although it is convenient for the Hope Academy should people want to send their children to that particular school. As you are no doubt aware, many Newton children go out of the borough for secondary education into Wigan

The housing proposed south of the Wayfarers estate and at Red Bank are all directly opposite the proposed Parkside development, with further traffic generation directly onto the A49. Chomley Drive housing was originally refused by St Helens Council, we understand, because it was opposite the entrance to the Parkside Development site. The housing was won on appeal. If St Helens council didn't believe the area was suitable for housing previously, why does it now? The land south of Wayfarers is productive agricultural land so there is loss of land that is currently in good use to houses and homes requiring council services and local infrastructure including schools and GP's etc. Does the council tax gain offset the cost of service provision to the families housed?

The same can be said for the land around Vulcan Village and at the back of the cemetery and the ongoing Jones Homes/Persimmon housing, on the former Vulcan Works. It takes out productive agricultural land and will put further strain on the local area with the traffic generation, loss of amenities, requirement for schools, GP's etc. There is still brownfield and derelict land in and around Earlestown which should be developed first. The central area of Earlestown is part of the Local plan but will be hollowed out if the housing goes on greenbelt elsewhere in Newton. Also, if this amount of housing (1700 plus) goes ahead on the edge of the borough at Newton there is no demonstration in the plan as to what, if any, positive contribution will be made to Newton and St Helens.

People who live in Newton tend to work outside of the Borough and shop elsewhere. Indeed they are encouraged to travel by the improved rail provision at the new station that attracts commuters from outside the borough into the local area already to 'park and ride'. 1700 new houses will have 1700 plus new cars on the roads. They will travel out of the borough and spend their money elsewhere. It happens now and it will in the future, so where is the economic gain for St Helens over and above the collection of council tax. If each new home paid say, £1500 a year in council tax, the gain from the 1700 houses would only be £2.5 million per year. New council tax seems to be the council's justification for such a level of development, without any costs being taken into account.

The houses proposed seem to be justified in the plan by the amount of warehousing proposed and the amount of warehousing by the number of homes built locally to support them. This is tin pot economics and not land use planning. The impact on Newton of such levels of development proposed for both housing and warehousing appears to be more negative than positive. It produces more detrimental impacts than the plan acknowledges or addresses. Locally for us it is nothing other than a plan for the ruination of Newton.

Please acknowledge receipt of our comments on the Draft Local Plan and your review of the greenbelt, to which we have responded within the time limits you have set and the constructive way you say you wish to engage with the residents of the borough.

27<sup>th</sup> January 2017.

Addition 30<sup>th</sup> January 2017

This morning on the Today programme they ran an article which outlined a study that had linked the effects of diesel emissions to both heart disease and dementia as well as the already known lung diseases. It stated by breathing in these emissions the damaging particles and gasses can be absorbed straight into the brain as well as travelling to the lungs. How would this plan deal with any increase in the poor health that may be caused by the damaging emissions from diesel lorries and how does this fit with the plan to increase the wellbeing of the residents of St Helens.

RO1761



701



St. Helens  
Council

St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form

Ref: LPSD  
**13 MAR 2019**  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).


Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MISS	Title:
First Name SODIE	First name:
Last Name: TUUSTALL	Last Name:
Organisation/company:	Organisation/company:
Address: 23, PARKFIELD ST WIGAN	Address:
Postcode: WN6 7ED.	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature  Date: 01/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> ✓

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Green Belt, is more vulnerable to development without the protection of an up to date, adopted local plan.

The Submission Draft, in some policy areas, fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (February 2019) (NPPF):

- a) Positively prepared – In fact too positive, leading to over-planning for jobs and housing.
- b) Justified – jobs and housing numbers are over estimated and more brownfield reuse is possible, these combined would erode 'exceptional circumstances';
- c) Effective – the policies would be more effective if the site allocations were based on a brownfield preference.
- d) Consistent with national policy – there are some policies that conflict with the NPPF, 2018 such as Section 11: Making the most effective use of land.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### LPA01 Presumption in Favour of Sustainable Development

I support Policy LPA01 Presumption in Favour of Sustainable Development, to ensure development is directed to the right places, for the right reasons to ensure minimum harm to rural land. There is so much benefit from our countryside, we should not sacrifice it so easily.

I hope that the Local Plan will bring a wide range of benefits, such as planning for sufficient and suitable jobs and homes for local people, particularly for the needs of more vulnerable groups like the elderly, and importantly for rural communities too.

***"The Council will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible"*** this wording will limit the development management function of the Council in the future. If a developer challenges a decision to refuse, the Council will be in a position where the onus is on it to show it has worked proactively with developers at appeal. Given the limited resources of the planning department, I am concerned that the planning team will not have the capacity to do this sufficiently and thus it will be more difficult to resist appeals from developers, and consequently they will be more likely to be allowed against local wishes.

In addition to planning for needed development, St Helens should have suitable policies and allocations to best protect the countryside and other natural spaces over the period from 2020 to 2035. Protecting the health of our natural environment, especially land near to large conurbations with large populations, protected by Green Belt designation, will consequently protect the health of large numbers of people. I am concerned that some policies in the local plan will not support Policy LPA01, such as over-planning for jobs and homes based on flawed assumptions and evidence that is not just.

#### Policy LPA02: Spatial Strategy

I strongly advocate a brownfield first approach, which is supported by the Government in Section 11 of the National Planning Policy Framework (NPPF), and the introduction of the Town and Country Planning (Brownfield Land Registers) Regulations 2017. I acknowledge in Local Plan paragraph 4.6.19 it says "As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area." the phrase "**as far as practicable**" makes LPA02 ineffective as it will be open to wide-interpretation by developers, and thus allow them to more successfully challenge the Council should it refuse development that is contrary to the local plan in the future especially if other unjustified policies in the local plan lead to the over-planning of jobs and homes.

I strongly oppose Green Belt release. I consider the estimates for jobs and housing to be too high, and if more suitable brownfield land was identified, and therefore in combination, there is not the exceptional circumstance to justify the release of Green Belt land.

The countryside is loved by many, and has real economic, social and environmental value. The benefit of all land in the countryside needs to be fully recognised in terms of jobs, added value to the economy, space to walk, ride a bike and for nature to have a home.

The negative impacts of losing land also need to be understood. Although delivering housing has benefit, it needs to be directed to places of assessed need, not just because a developer or land owner has responded to the call for sites. Many developers chase land value rises from farmland being allocated for residential use, and they aren't interested in issues such as sustainability, ecology, rural economic sectors.

The Council on behalf of its electorate has a responsibility to look after the countryside for the benefit of all of us, and for future generations. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land full stop. But, safeguarding, will mean that the local plan updates in the future, can refine the jobs and housing figures, and ensure for a contingency albeit we recommend at a more radically reduced reasonable scale.

**Policy LPA03: Development Principles**

I support Policy LPA03: Development Principles, places should be inclusive and deprivation should be alleviated in the future. Like my comments to LPA01 and LPA02 I am greatly concerned that by including unjustified, unrealistic jobs and housing requirements it will not be able to fulfil this policy. The Government's NPPF penalises Councils in cases where they are deemed to have failed to meet "Objectively Assessed Needs". Therefore, it is imperative St Helens is not saddled with unreasonably high jobs or housing requirements.

3

**Policy LPA04 Strategic Employment Sites**

I am strongly opposed to Green Belt land release for employment use. The Council has identified that at least 215.4 hectares of new employment land should be developed in St.Helens, I regard this as unjustly excessive. I believe realism must be applied and the use of up to date data is recommended. The projections for job growth across office (B1), manufacturing (B2) and warehousing/distribution (B8) are unlikely to bear out in reality. This would cause an over-supply of employment property and have an adverse effect on the property market. It would lead to widespread vacancies.

Dr. Glenn Athey, economist concludes that there is a lack of transparency over the process that the Oxford Economics Forecasts have used when determining both the joint Liverpool City Region Combined Authority (LCRCA) and St Helens borough (St Helens) planning policies. Documentation would suggest that these forecasts are 'policy-led' and not 'objectively assessed', and are, in any case out of date – along with several other assumptions underpinning employment land policies, including forecasts of port freight. Considering Dr Athey's expert opinion, the Council should review the evidence as it is in the public interest to see a proper and transparent process for identifying objectively assessed need has been used. The continuing global uncertainties, exacerbated by Brexit, and more pessimistic medium and long term scenarios should be factored in properly.

Taking into account the fact that all the surrounding geography in Liverpool City Region, Greater Manchester and Cheshire is simultaneously planning for growth. There is no obvious source of people to take up the jobs in St Helens. Table 2.1 Labour Market Indicators in St Helens Borough shows unemployment in St Helens is low when compared to the rest of the North West and England, at only at 3.6% compared to 5.1% and 4.3% respectively. Workers are returning to European countries and the Government is not allowing for an increase in immigration from non-EU countries, so it does remain puzzling as to where the employees for the jobs would come from.

4

It would be grossly negligent for the Council to allocate too much farmland, which is important for future food security, and is currently protected by Green Belt designation based on economic analysis that is flawed and consequently not fully justified. Furthermore, it would be contrary to the Council's intention to "support proposals to help diversify the rural economy, including through the re-use of suitable buildings in rural areas for appropriate employment uses, subject to other policies in the Plan", which is supported. I am concerned about the negative impacts to the local rural economic sectors, and not least the gross value added to the entire North West Region as the food and drink sector is a growth sector and involves many businesses, and jobs directly, and indirectly.

What is the local benefit of B8 Warehousing formats with new technology replacing human resources, there has already been considerable B8 development achieved speculatively at Florida Farm and Haydock Park, and in neighbouring authorities, questioning the need for such an excessive amount in the countryside? The duty to cooperate has been non-existent on the cumulative harm from such big intrusions in Green Belt in neighbouring authorities causing sprawl along the M6, M61 and M62 motorways. Despite calls for action to the Secretary of State from local MPs, the harm has not been addressed by the Ministry for Housing, Communities and Local Government. We should be moving forwards in accordance with promises by Government to protect Green Belt.

**Policy LPA04.1: Strategic Employment Sites**

I am opposed to needless release of Green Belt land for employment uses  
Planning applications for development within a Strategic Employment Site should be supported by a comprehensive masterplan covering the whole Site, which must set out details of at least a) to j).

5

**Policy LPA05: Meeting St.Helens Borough's Housing Needs**

Research shows that housing assessments produced by local authorities (SHMAs) are inaccurate, inflated and unreliable. The housing figures produced by SHMAs are not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver.

6

The Government in July, 2018 introduced stringent Housing Delivery Tests, which Councils are to be assessed against. If they fail, it results in more countryside land being approved for development. So, now it is even more incumbent on Council's not to plan for one single house too many, as if the housing industry lacks capacity, or stops building due to poor market conditions, the public is penalised if the council is assessed as having failed, and more beloved countryside will be lost to development. Government repeats brownfield first encouragement, and promises continued Green Belt protection.

The Government has a growth policy for housing, and in National Planning Policy Framework Section 5 it sets out local planning authorities "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

Speaking in a parliamentary debate, Mr. Malthouse stated that any planning inspector will accept a "properly evidenced and assessed variation" from the target, adding "If, for example, you have constraints like areas of outstanding natural beauty or Green Belt or whatever it might be, and you can justify a lower number, then an inspector should accept that". These words should allow St Helens, with its important Green Belt setting, to make the case for lower housing numbers.

The Government should rely on relevant and up to date evidence, as it sets out as a general requirement of national planning policy, as explicitly stated in NPPF, 2018, paragraph 31 of the that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

Expert demographer Mr Piers Elias, demonstrates that the 2016-based data would yield a much-reduced figure of 360 dwellings per year. And, based on the opinion of expert economist Dr Athey, the employment projections should be further adjusted downwards to reflect up to date data and realistic assumptions, relating to the current economic realities, then it follows the housing requirement also needs to be adjusted downwards. Whereas, the submission local plan identifies a need for at least 9,234 new dwellings (at an average of at least 486 new dwellings per year) to be completed between 2016 and 2035. Allowing for expected completions before 2020, this figure translates to a minimum of 7,245 dwellings within the Plan period from 1 April 2020 to 31 March 2035. The SHLAA identifies enough housing land to accommodate 7,817 dwellings, including the windfall allocation. The Brownfield Register 2017 identified enough land to accommodate 5,818 dwellings, therefore only 1,427 homes on greenfield (at an average build out rate of 40 per hectare this equates to 35 hectares) should be required. However, there may be more brownfield sites yet to be recorded on the Brownfield Register. The minimum density should be increased to at least 35 dwellings per hectare (dph) as 30 dph could be deemed as contrary to Section 11 of the NPPF as it does not make effective use of land. There are likely to be sites assessed as unsuitable for the Brownfield Register that could in fact be considered as suitable, meaning more brownfield land is available for development.

Table 4.6 should be up dated, to evidence a lower housing requirement figure, to show a brownfield land figure, and to reduce the amount of housing numbers being focused in the Green Belt. The Council could introduce a brownfield target, to focus activity regarding a brownfield preference. Table 4.7 shows a range of annual requirements with the highest identified of 78 dwellings in the year 2025/26, which is unfathomably high. St Helens would struggle to achieve such a high figure, and it is doubtful that the private sector, even if supported by public sector development could reach such an impossible figure. For three decades St Helens has had a declining population, only in 2007 did a modest 0.2% growth happen. The guesstimate figures bear no resemblance to this fact.

Adequate affordable, or low cost housing should be provided to cater for lower income households.

The Council needs to adopt a more precautionary approach to countryside loss. The countryside is loved by many and has benefit to us all. A pre-cautionary approach would avoid the unnecessary release of valued Green Belt land. Local plan updates in the future means jobs and housing figures can be revised upwards or downwards based on robust analysis later.

#### **Policy LPA05.1: Strategic Housing Sites**

I am opposed to needless release of Green Belt land for housing.

6

7



RO1762





St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**.  
**Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1185  
13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: <i>HRS</i>	Title:
First Name: <i>Elsie May</i>	First name:
Last Name: <i>Turner.</i>	Last Name:
Organisation/company:	Organisation/company:
Address: <i>18 JUBITS LANE SUTTON MANOR</i>	Address:
Postcode: <i>WA9 4RQS</i>	Postcode:
Tel No:	Tel No:
Mobile No:	Mobile No:
Email:	Email:

Signature: [REDACTED] Date: *28-3-19.*

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1763



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1250

13 MAY 2019

### 1. Your Details

(we will correspond via your agent)

Title: MRS

First Name: PAULA

Last Name: TURNER

Organisation/company: -

Address: 12 HALL ST,

CLOCKFALL, ST HELENS

MERSEYSIDE

Postcode: WA4 4DN

Tel No: -

Mobile No: [REDACTED]

Email: [REDACTED]

### 2. Your Agent's Details (if applicable)

Title: \_\_\_\_\_

First name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Organisation/company: \_\_\_\_\_

Address: \_\_\_\_\_

Postcode: \_\_\_\_\_

Tel No: \_\_\_\_\_

Mobile No: \_\_\_\_\_

Email: \_\_\_\_\_

Signature: [REDACTED]

Date: 21st April 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1764



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

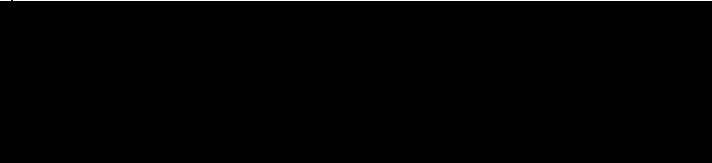
**Part A - Personal Details**

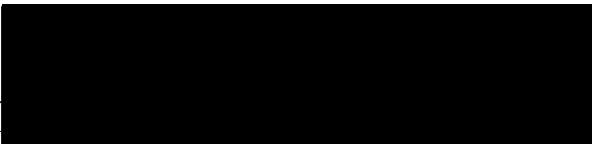
**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1238  
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Miss</u>	Title: _____
First Name: <u>Laura</u>	First name: _____
Last Name: <u>Turner</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>7 Primula Close</u>	Address: _____
<u>New Bold</u>	_____
<u>St. Helens</u>	_____
Postcode: <u>WA9 4WQ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 19.04.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1765





St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

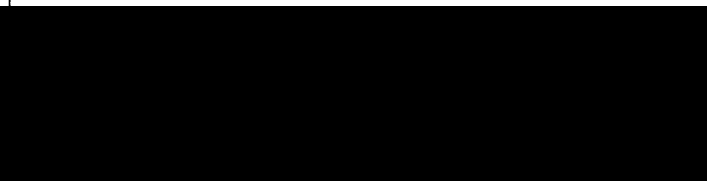
**Part A - Personal Details**

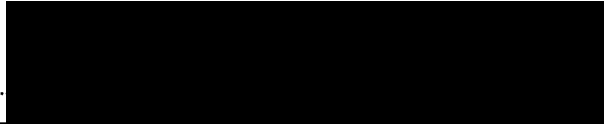
**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1239  
13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>WAYNE</u>	First name: _____
Last Name: <u>TORNER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>12 HALL ST</u>	Address: _____
<u>CRACKFACE</u>	_____
<u>ST. HELENS</u>	_____
Postcode: <u>WA9 4XN</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 20/4/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1766

PF 1178



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

1259

13 MAY 2019

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: STUART	First name:
Last Name: TURNER	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 30/4/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1767

PF1179



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Monday 13th May 2019. Any comments received after this deadline cannot be accepted.

This form has two parts; Part A – Personal Details Part B – Your Representation(s).

PART A – YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1260 13 MAY 2019

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MRS	Title:
First Name: GAYNOR	First name:
Last Name: TURNER	Last Name:
Organisation/company:	Organisation/company:
[Redacted]	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature: [Redacted]	Date: 30/4/19
-----------------------	---------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

RO1768



St.Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Monday 13<sup>th</sup> May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

13 MAY 2019

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: PHILIP	First name:
Last Name: TURNER	Last Name:
Organisation/company:	Organisation/company:
Address: 71 THE PASTURES BOLD ST HELENS	Address:
Postcode: WA9 4ZA	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 18/4/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.



RO1769

NO SPECIFIC ON POLICY QUOTE  
 ONLY STATE VIEW IS IN-LINE WITH  
 THE BOLD & CLOCK FACE ACTION GROUP

**Representor Details**

Web Reference Number	WF0035
Type of Submission	Web submission
Full Name	Mr William Turner
Organisation	
Address	22 The Pastures New Bold St Helens WA9 4ZB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA02, 03 & 05
Paragraph / diagram / table	
Policies Map	policies map
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	Supporting documents as provided by Bold and Clock Face Action Group

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

My view is in line with and the same as that of the Bold and Clock Face Action Group.

**7. Please set out modification(s) you consider are necessary**

My view is in line with and the same as that of the Bold and Clock Face Action Group.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/13/2019 4:29:39 PM
---------------	----------------------

RO1770



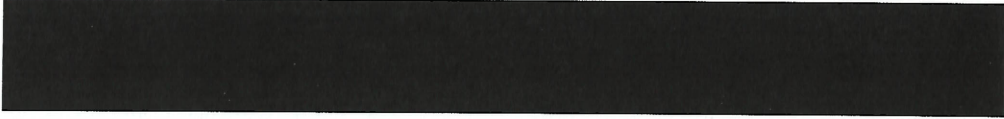
St Helens Borough Local Plan 2020-2035  
 jane to: planningpolicy@sthelens.gov.uk

Site 8HA

EL0181

- ① - LPAOS
- ② - Para 1.7.2
- ③ - S.A.

13/03/2019 13:05

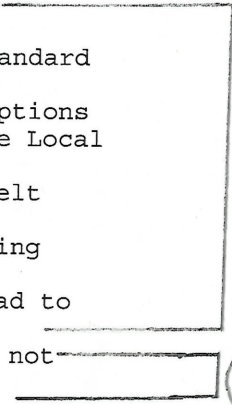


Dear Sir or Madam,

Please find below my comments that We would like to form our representation for this submission.

In respect of the overall figures in the Plan;

- there are no exceptional circumstances to justify not using the standard method to calculate housing need
- the economic analysis is flawed and based on over-optimistic assumptions
- the level of land needed is therefore not as high as set out in the Local Plan
- therefore there are no exceptional circumstances to change Green belt boundaries
- other reasonable alternatives have not been fully explored, including lower target figures and using more previously developed land
- these alternatives will have less impact on the environment and lead to less need for new infrastructure
- the Council have failed to co-operate with other councils and have not published any statement(s) of common ground

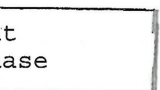


For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

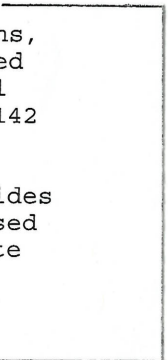
SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and by allocating more previously developed land.

Specific points on site HA8 (Rookery Lane)

- Only 4 sites score 4 negatives\* (red) on the Sustainability Appraisal, and the other 3 have all been discarded. So SHBC's own assessment is that HA8 is the least appropriate Green Belt site allocated for housing in Phase 1.



- This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142



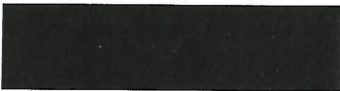
- The site is Grade 1 Agricultural Land and is actively farmed and provides employment in the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The SHLP is intended to promote employment and economic growth yet this will have the opposite effect.

- There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land.

I hope these comments are taken into consideration and acted on appropriately, many thanks for your time.

Jane Turton





27 Cartwright Close  
Rainford  
St. Helens  
Merseyside  
WA11 8DG

RO1771

**Representor Details**

Web Reference Number	WF0123
Type of Submission	Web submission
Full Name	Mrs Phillipa Twiss
Organisation	
Address	130 Kiln Lane Eccleston St Helens Merseyside WA10 4RJ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not promote sustainable development due to increased dependency on the car. This is due to the remote transport hubs and no visible changes in the transport hub which would discourage this dependency. The Saturn Traffic model appears to be out of date. The sustainable targets appear aspirational rather than factually based for employment growth predictions which again focuses on the requirements of a car dependency. This congestion will lead to a decrease in air quality around key receptor sites due to the loss in efficiency of vehicles travelling in the area and unreliable journey times.

The proposal will add to the long term problems at key nodes around Windle Island, Bleak Hill Road, Skew Bridge (Rainhill), M6 J1-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline or address how local and borough wide road improvements are to be made and funded. This therefore promotes unsustainable traffic growth causing serious traffic issues that will not satisfy the NPPF (2016).

Increased traffic flows along minor routes and those diversions to avoid congestion will lead to damage to local through routes and further issues with air quality and noise.

Why was a VISSIM Model not used in addition to the SATURN Model? Also why was mobile phone data not used in the modelling?

01  
LA05

02  
LA05

The plan does not appear to take account of cross border collaboration and the housing need assessment does not use standard methodology and the estimates on housing are outdated with respect to current ONS information. There is also no attention for detail with regards the use of brownfield sites or the remediation of land when sustainable development relies on the reuse of brownfield sites. This is reflected with respect to other local authorities and it is unreasonable that 'unsuitable sites' can not be remediate and made available for the period considered in the plan. The loss of green belt and grade 1 and 2 agricultural land is also not sustainable and will impact on agriculture and distribution along with loss of habitat, flood plains and retention will also have a negative impact on the environment and area. Has climate change been considered with regards the risk of flooding when developing the area? Local amenities are also inadequate and not covered in suffice to detail to outline what will be undertaken to increase resilience in the services.

02  
497105

**7. Please set out modification(s) you consider are necessary**

Review the modelling information around traffic, the housing information, sustainability, farming, Habs Regs and flooding risks plus resilience of the local transport routes, nodes and minor roads used when diverting around traffic congestion, the impact on farming, the failure to use up to date information.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 10:16:17 PM
---------------	-----------------------



RO1772

**Representor Details**

Web Reference Number	WF0126
Type of Submission	Web submission
Full Name	Mr Matthew Twiss
Organisation	
Address	130 Kiln Lane Eccleston St Helens Merseyside WA10 4RJ
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	St Helens Borough Local Plan - Eccleston
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The plan does not promote sustainable development due to increased dependency on the car. This is due to the remote transport hubs and no visible changes in the transport hub which would discourage this dependency. The Saturn Traffic model appears to be out of date. The sustainable targets appear aspirational rather than factually based for employment growth predictions which again focuses on the requirements of a car dependency. This congestion will lead to a decrease in air quality around key receptor sites due to the loss in efficiency of vehicles travelling in the area and unreliable journey times.

The proposal will add to the long term problems at key nodes around Windle Island, Bleak Hill Road, Skew Bridge (Rainhill), M6 J1-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline or address how local and borough wide road improvements are to be made and funded. This therefore promotes unsustainable traffic growth causing serious traffic issues that will not satisfy the NPPF (2016).

Increased traffic flows along minor routes and those diversions to avoid congestion will lead to damage to local through routes and further issues with air quality and noise.

Why was a VISSIM Model not used in addition to the SATURN Model? Also why was mobile phone data not used in the modelling?

01  
LPA04

02  
LPA05

The plan does not appear to take account of cross border collaboration and the housing need assessment does not use standard methodology and the estimates on housing are outdated with respect to current ONS information. There is also no attention for detail with regards the use of brownfield sites or the remediation of land when sustainable development relies on the reuse of brownfield sites. This is reflected with respect to other local authorities and it is unreasonable that 'unsuitable sites' can not be remediate and made available for the period considered in the plan. The loss of green belt and grade 1 and 2 agricultural land is also not sustainable and will impact on agriculture and distribution along with loss of habitat, flood plains and retention will also have a negative impact on the environment and area. Has climate change been considered with regards the risk of flooding when developing the area?  
Local amenities are also inadequate and not covered in suffice to detail to outline what will be undertaken to increase resilience in the services.

**7. Please set out modification(s) you consider are necessary**

Review the modelling information around traffic, the housing information, sustainability, farming, Habs Regs and flooding risks plus resilience of the local transport routes, nodes and minor roads used when diverting around traffic congestion, the impact on farming, the failure to use up to date information.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 10:08:39 PM
---------------	-----------------------

RO1773

13 MAR 2019

Ref: LPSD

(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>GAIL</u>	First name: _____
Last Name: <u>TWIST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>91, WINDLE GROVE</u>	Address: _____
Postcode: <u>WA10 6HP</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: Date: 12/03/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> NO the plan is based on flawed methodology
Effective?	<input type="checkbox"/> NO - plan not deliverable
Consistent with National Policy?	<input type="checkbox"/> NO - it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p>The requirement for Sustainable development based on flawed data, Housing Need assessment does not use standard Methodology, Over estimation of housing needs, Council are using older forecast (2014) of 426 per year instead of (2016) ONS of 383 houses per year Borough has significant traffic problems, Windle Island, Bleak Hill Rd.</p>

Please continue on a separate sheet if necessary

• Gail Twist, 91, Windle Grove WA106HP

The increase in traffic proposed in the plan will have a significant impact on air quality and general health.

The IDP fails to explain the impact on Healthcare and Education. There is no indication or reference to collaboration with the Hospital Trust, local CCs or educational authorities.

The impact on our Hospitals and social services, which are already overstretched, will be immense.

We all need green spaces for our well being, both physical and mental health. This plan does not take any of these matters into consideration



**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The plan needs to be modified and concentrate on brownfield development, on 70% of the 3,170-ha available brownfield would be needed. This is lowest priority contaminated brownfield land, so cost of de-contamination would not be great. The cost of infrastructure, widening Houghton Lane traffic island, would be far more expensive. Bleak Hill Rd, would also be taking far more traffic, there is no mention of local and borough wide road improvements. The plan promotes unsustainable traffic growth causing traffic issue that will not satisfy the NPPF (2016)

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

<input type="checkbox"/> No, I do not wish to participate at the oral examination	<input type="checkbox"/> Yes, I wish to participate at the oral examination
---	---

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1774

7915

13 MAR 2019

Ref: LPSD  
  
(For official use only)



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.


This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: _____
First Name: <u>JOHN PHILIP</u>	First name: _____
Last Name: <u>TWIST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32, ECCLESFIELD RD</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA 10 5NB</u>	Postcode: _____
Tel No: 	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>12th March 2019</u>
--	------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019 by:**

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

If you still need assistance, you can contact us via:

Email: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: **[www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)**

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> The plan is based on flawed methodology.
Effective?	<input type="checkbox"/> No plan underpins it.
Consistent with National Policy?	<input type="checkbox"/> No. It does not comply with NPPF 2018.

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <ol style="list-style-type: none"> <li>This plan does not satisfy requirement for sustainable development.</li> <li>The plan promotes increased car dependency. Poor bus service or no train service.</li> <li>Sustainable housing targets proposed are based on aspirational growth predictions.</li> <li>Plan concentrates on Green Space development over town centre development. With higher densities.</li> <li>Food security by ignoring agricultural land quality.</li> </ol>

Please continue on a separate sheet if necessary

7.  
John Philip Twist  
32, Ecclesfield Rd, WA10 5NB.

Increased traffic in Ecclestone and Windle will have a significant impact on air quality and health in general. It has been medically proven that poor air quality causes asthma and other respiratory problems. The infrastructure of Ecclestone and Windle was not designed for the proposed increase in traffic.

The environment will significantly affect the habitat of wild life. This includes hares, foxes and in particular several species of birds, which includes birds of prey like the kestrel. The kestrel has a nest in Ecclesfield Rd.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan makes no mention of Brown Field use.  
 Only 7% of the 3170/HA Brown Field would need to be decontaminated to save the Green Belt.  
 The loss of grade 1 and 2 agricultural land, that comprises of most allocated and safeguarded sites is not mentioned. This will have a negative impact on farming and distribution jobs, at a time Britain needs to grow more food.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1775





St Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

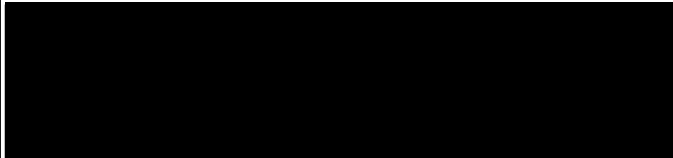
This form has two parts;

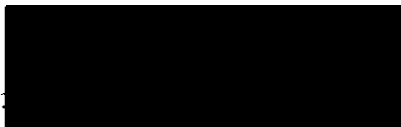
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>Ann</u>	First name: _____
Last Name: <u>Twist</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>32, ECCLESFIELD RD</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA105NB</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 12<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> the plan is based on flawed methodology
Effective?	<input checked="" type="checkbox"/> NO - plan undeliverable
Consistent with National Policy?	<input type="checkbox"/> NO - it does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>1. Does not satisfy requirement for Sustainable development.</p> <p>2. Plan promotes increased car dependency, poor bus service, or no train service.</p> <p>3. Sustainable housing, targets proposed are based on aspirational growth predictions</p> <p>4. Plan concentrates on Green Space development over town centre development with higher densities</p> <p>5. food security by ignoring Agricultural Land Quality</p>

Please continue on a separate sheet if necessary

Ann Twist 32, Ecclestone RD  
WA105NB.

The increase in traffic in Ecclestone and Windle will have a significant impact on air-quality, and general health. It has been medically proven that poor quality causes asthma, and other respiratory problems.

The Infrastructure of Ecclestone and Windle are not designed for the proposed increase in traffic.

I am very concerned about the increase in traffic near primary schools, also the fact Rainfact High pupils have to cross very busy roads to get their school bus.

This plan promotes unsustainable growth causing severe traffic issues that will not satisfy the NPPF (2016).

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The plan makes no mention of brownfield use. Only 7% of the 3,170-ha brownfield would need to be decontaminated, to save the Green Belt.

The loss of Grade 1 and 2 Agricultural land, that comprises of most allocated and safeguarded sites is not mentioned. This will have a negative impact on farming & distribution jobs. At time Britain needs to grow more food.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
--	--

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1776

13 MAR 2019

Ref: LPSD

(For official use only)



St Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mr</u>	Title: _____
First Name: <u>MICHAEL</u>	First name: _____
Last Name: <u>TWIST</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>91 WINDLE GROVE</u> <u>ST HELENS</u>	Address: _____
Postcode: <u>WA10 6HP</u>	Postcode: _____
Tel No:	Tel No: _____
Mobile No: _____	Mobile No: _____
Email: _____	Email: _____

Signature:

Date: 12<sup>th</sup> March 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**



## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulations Assessment
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/> NO, the plan is based on
Effective?	<input checked="" type="checkbox"/> flawed methodology
Consistent with National Policy?	<input checked="" type="checkbox"/> plan not deliverable NO does not comply with NPPF 2018

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound</u> or fails to comply with the duty to cooperate. <u>Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>Does not satisfy!</p> <ul style="list-style-type: none"> <li>Requirements for sustainable transport, plan promotes increased car dependency.</li> <li>Sustainable housing targets proposed are based on aspirational employment growth predictions.</li> <li>Concentrating on Green Space development over town centre development with higher densities.</li> <li>food security by ignoring Agricultural land Quality.</li> </ul>

**7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

I am very concerned about, unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016). The increased traffic will have a severe impact on air quality. I am very worried about the impact on children, [redacted] who attend the local schools, roads passing the schools will increase with traffic. Houghtons Lane was never envisaged for the heavy traffic that will increase if this proposal is accepted. Healthcare and Education is not explained in the IOP, how this will be managed or funded.

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

**8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)**

<p>No, I do not wish to participate at the oral examination</p>	<p>Yes, I wish to participate at the oral examination</p>
---	---

**9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1777

EF0058/  
01-11



PAG Response to Local Plan Draft Submission

Dave Tyas

to:

planningpolicy@sthelens.gov.uk

13/03/2019 09:30

Cc:

[Redacted]

Hide Details

From: Dave Tyas

[Redacted]

To:

[Redacted]

Cc:

[Redacted]

[Redacted]

3 Attachments



lpsd-representation-form (PAG Signed Front Page Feb 2019).pdf



PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary).pdf



lpsd-representation-form PAG March 2019.pdf

Please find attached SHC response form and supporting Non-Technical Summary document on behalf of Parkside Action Group (PAG).

Please note our supporting Planning Context document will shortly follow this email by reply.

Our supporting Biodiversity document is running a little behind schedule but we should have this with you next week.

Regards,

Dave Tyas

Co-Chair PAG.

EF 0058/  
01-11



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows WA12 0BZ	Address:
Postcode:	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature: [REDACTED] Date: 23 - FEB - 2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)



St. Helens Council

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
(For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mr.	Title:
First Name: Dave	First name:
Last Name: Tyas	Last Name:
Organisation/company: Parkside Action Group	Organisation/company:
Address: 4 Holford Way Newton-le-Willows	Address:
Postcode: WA12 0BZ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No:	Mobile No:
Email: [REDACTED]	Email:

Signature:  Date:

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or** by e-mail to: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy LPA10		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Parkside West and Parkside East are referenced directly or indirectly in the following documents: LPA02; LPA04; LPA04.1; LPA06; LPA08; LPC09; LPC10; LPC11; LPC12; LPC13; LPC14; LPD09; LPSD7EA; LPSD8EA; GBP_039; GBP_041			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

- Please see documents:
1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
  2. R.Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)
  3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report)



Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see documents:

1. PAG Response to St Helens Local Plan Submission Draft January 2019 Final (Non-Technical Summary)
2. *R. Ward Member of PAG Response to St Helens Local Plan Submission Draft January 2019 (Planning Context)*
3. PAG Response to St Helens Local Plan Submission Draft January 2019 (Biodiversity Report)

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input type="checkbox"/>	<b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>	<b>Yes</b> , I wish to participate at the oral examination
--------------------------	--	-------------------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

PAG previously contributed constructively to the adopted Core Strategy and represents the views of a sizeable part of the local community.

Mr Richard Ward's (PAG) article was used as a reference source in the National Planning Authority Historic England Registration Application to approve the Battle of Winwick Pass as a Registered Battlefield.

We reserve the right to bring with us, others who we will identify nearer to the time, to make the case for the "Local People" before the inspector.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

EF0058/  
01-11  
Policies:-  
LPA10  
LPA04  
Sites 7EA &  
8EA

**Parkside Action Group**  
**PAG Response to St Helens Local Plan Submission Draft**  
**January 2019**  
Non-Technical Summary, March 2019



**Table of Contents**

1	Purpose .....	4
2	Introduction .....	4
3	Local Plan Parkside Policy .....	4
4	Summary .....	9

*Pictures Front Page Top to Bottom:*

- 1. Summer Parkside East (proposed rail freight container depot)*
- 2. A49 near Parkside Entrance (proposed Langtree Warehouse Development)*
- 3. Winter Parkside East*
- 4. Summer Parkside East adjacent to the M6*

### Document History

Version/Date	Author	Updates
Draft D1 18-Feb-2019	Dave Tyas	New document
Draft D2 23-Feb-2019	Dave Tyas	Updated following initial feedback
Final 10-Mar-2019	Dave Tyas	Updated following feedback

### Glossary

Term	Description
AQMA	Air Quality Management Area
EIP	Examination in Public
ELNS	Employment Land Needs Study
ES	Environmental Statement
NPPF	National Planning Policy Framework
PLR	Parkside Link Road
RSS	(North West) Regional Spatial Strategy
SHC	St Helens Council
SRFI	Strategic Rail Freight Terminal
TA	Traffic Assessment

### Document References

Ref	Filename/Description
1	PAG Response to St.Helens Local Plan Preferred Options December 2016 Final 1.0
2	Employment Needs Study (ELNS), Addendum Report, October 2017, Amended January 2019
3	Green Belt Review December 2018
4	
5	
6	
7	
8	
9	
10	

## 1 Purpose

1.1 This document provides a response to the St Helens Local Plan Submission Draft January 2019.

## 2 Introduction

2.1 PAG was formed in 2006 to protect the land around the site of the former colliery from unsuitable development.

2.2 PAG has previously responded and contributed to several consultations and planning applications including:

- North West Regional Spatial Strategy including Examination in Public, 2006 thru 2008.
- Newton Park Farm Planning Application including NPPF considerations, 2007.
- St Helens LDF Core Strategy 2009 thru 2012.
- St Helens Local Plan (Preferred Options) 2016.
- Astral/Prologis Parkside Planning Applications 2006 thru 2009.
- Parkside Phase 1 Planning Application Feb 2018 & Jan 2019
- Parkside Link Road Planning Application April 2018

## 3 Local Plan Parkside Policy

3.1 PAG understand that the next stage of the Local Plan process will be an 'Examination in Public' of the Draft Submission. With this in mind this document is structured into topics that we would request the EIP Planning Inspector review and bring before relevant hearing panel as deemed appropriate. The topics build on our previous response to the Preferred Options Draft of the Local Plan (ref 1) and additional evidence submitted by the Council to support the Draft Submission.

3.2 As stated in several Council documents associated with the Draft submission two planning applications are currently awaiting determination related to Parkside. The first Parkside Phase 1 targets approximately 50% of Parkside West for road freight distribution use making use of local roads for access. The second proposes to build a link road from the A49 to the M6 J22 to facilitate promotion of development at Parkside West and East. In both cases the applicant is in effect St Helens Council. In the case of Parkside Phase 1 the applicant is Langtree Developments. The Council are in partnership with this developer and have loaned the company millions of pounds to fund their application. In the case of the Link Road, the Council are the applicant. The net outcome is that the Council are in the position of 'marking their own homework' for both applications. When considered along side the Local Plan where the Council are also the author, the opportunity for fair and unbiased consideration for local community and environmental impacts is perceived to be almost non-existent.

3.3 References to individual planning applications should be removed from the Draft Submission document and/or evidence papers because they may never happen or may change. They represent implementation proposals and not strategic or policy-based information.

3.4 Both Parkside East and Parkside West are currently allocated as Green Belt as specified in the adopted St Helens Core Strategy. In the Core Strategy, Policy CAS 3.2 protects Parkside East and West from release of Green Belt unless a specific set of conditions are met. The goal of the Core Strategy was to protect a 'strategic' site for use of a Rail Freight Terminal and also protect against other impacts of potential development such as use of local roads for site traffic. PAG and the local community fought hard to get these conditions incorporated into the local plan and protect the Green Belt from inappropriate development.

01

01  
LPA 10  
Sites  
7EA  
2  
8EA

02

02  
LPA 10  
Sites  
7EA  
2  
8EA

02

3.5 The Submission Draft has no specific policy for Parkside West. The conditions specified in CAS 3.2 have been removed which we strongly disagree with, particularly protection of local roads from site traffic, associated impacts to air quality, and protection of local heritage (additional details provided in the summary at the end of this document).

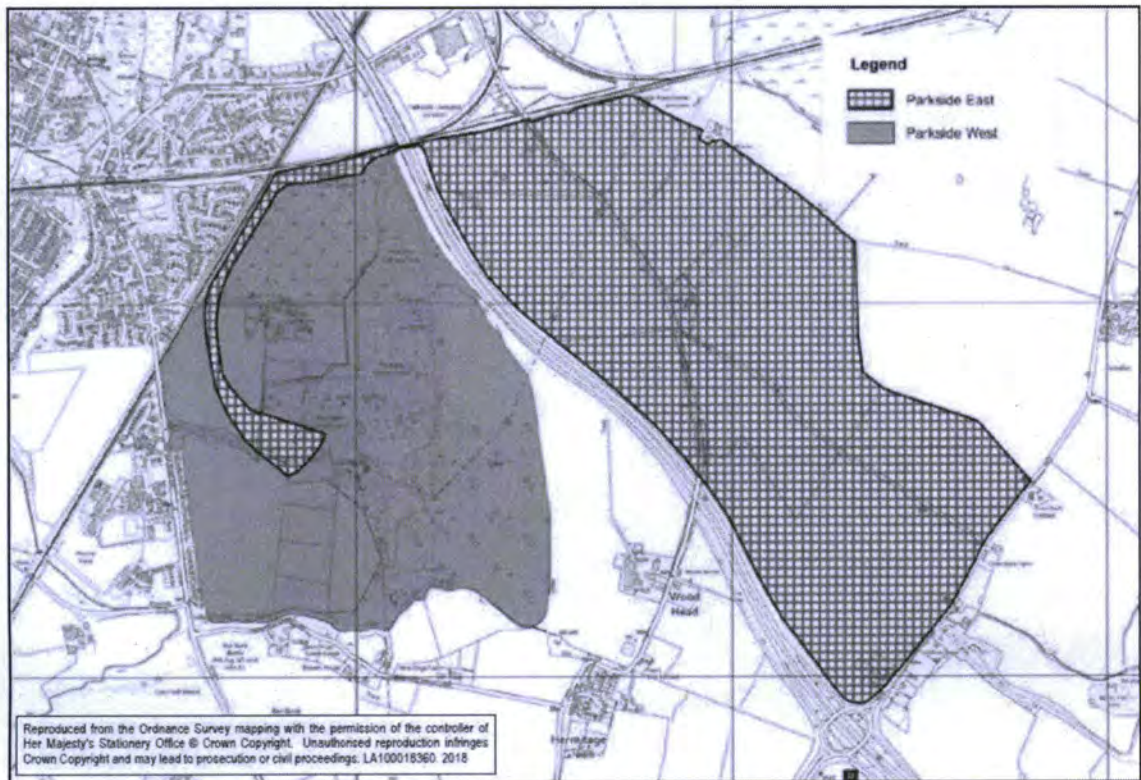
02

03

3.6 The Local Plan now specifies Parkside West as 'employment development land' rather than being set aside for use as Rail Freight Terminal. In doing so the capability for Rail Freight and Inter Model operation has in effect been at least halved assuming Parkside West is approximately the same size as Parkside East. **PAG have never supported the use of the site as a Rail Freight Terminal**, however, as early as 2006 in the North West Regional Spatial Strategy, the site was recognised as strategically important for rail freight as later supported by SHC Core Strategy Policy CAS 3.2. Of note a planning application in 2007 for 32 houses in support of Newton Park Farm refurbishment was approved by a Planning Inspector but the decision was overturned by the Secretary of State at the time because the development may prejudice a freight terminal. So why then has the Council sacrificed a significant proportion of the site for non-rail related activities in direct opposition to previous government direction? If we are to believe previous strategic documents, policies and planning decisions on this matter, Parkside as a location is of national importance and the land should be safeguarded.

03  
LPA10  
Sites  
7SA &  
8EA

Parkside East & Parkside West



3.7 Turning to Parkside East this is an area of open countryside never associated with the former colliery and hard standing areas on Parkside West. Unlike the Core Strategy this is now the only land reserved by the Local Plan for a Rail Freight Terminal (other than a rail spur strip on Parkside West to allow bidirectional train traffic to access Parkside East).

3.8 In order to open up the area for development the Council have submitted a planning application for a Link Road which links the A49 with M6 J22. The Link road is touted as

alleviating traffic for the local area, when in effect all it will do is facilitate the movement of site traffic onto the local road network. Some of the local country roads are highly unsuitable for heavy good vehicle traffic with tight bends, narrow sections, and low railway bridges subject to strikes.

03

3.9 The proposed route for Link Road also dissects Parkside East and reduces the land area for Parkside East, significantly limiting the flexibility for Rail Freight use. Of note the Link Road was never considered as part of the freight terminal topology options presented in the evidence base with the Local Plan Preferred Options stage, meaning that a very significant assumption has been made that a Freight Terminal is actually viable on Parkside East, particularly with regards to loading space, and 770m siding operation.

03

3.10 We also note that evidence presented with the Draft Submission states that 770m capability is a 'soft requirement'. This is a very strange assertion given that Network Rail have spent the last few years adding 770m capability to the entire UK rail network? A non 770m freight terminal would again offer reduced capability.

3.11 In summary the removal of Parkside West and the Link Road route have severely reduced the capability as strategic rail freight site with available land being reduced by as much 60-70% approximately in total.

3.12 So why has this approach being taken by the Council? The Council are looking to capitalise on the recent change from high street to internet shopping. This has generated an anticipated demand for warehouses from which the Council can earn revenue in the form of business rates. The drive for additional revenue appears to exceed all other national strategic & local environmental considerations.

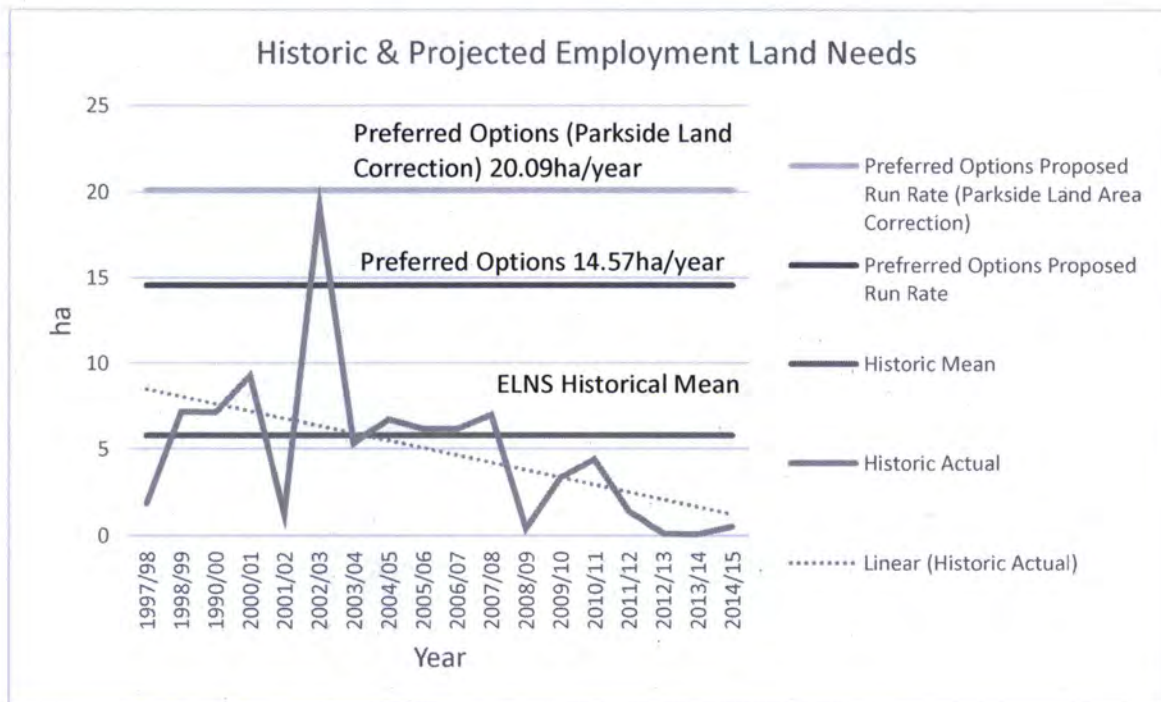
04  
LPA10

04

3.13 In order to justify their approach, the Council have attempted to build a case that land is required to satisfy employment needs. In this respect PAG pointed out obvious errors and flaws in their calculations at the Preferred Options stage. This has resulted in a revised ELNS document, Ref 2, provided with the Draft Submission. The revised ELNS attempts but fails miserably in our view to explain excessive employment needs forecasts to justify the need to remove Parkside from Green Belt. In our Preferred Options response, Ref 1, we presented the following graph which showed just how unrealistic the estimates were.

75A e 5EA





04

3.14 Para 2.9 of the revised ELNS , Ref 2, states 'Having this additional two years of information enables the average take-up levels used in the ELNS to be updated, summarised in Table 5. It is apparent that the most recent two years do not represent a return to growth comparable to the peak period of 1998-2008 (averaging 7.5 ha per annum), the basis of the Growth Period scenario in the ELNS. Therefore, this Growth Period scenario forecasting will not have changed from the ELNS.' **In other words, things have not picked up as expected but we are still going to use a small band of data from over 20 years ago as the basis for our future forecast.**

3.15 The revised ELNS goes on to try and explain how the Council plan to compensate for over employment capacity caused by the scale of their development proposals.

3.16 Para 5.5 states 'Therefore, it is apparent that the traditional working age population of St Helens would not be sufficient to service a growing employment demand, assuming all other factors remain the same (e.g. unemployment rate, economic activity rate, etc.).'

3.17 Para 5.12 sates 'In order to maintain the same number of employed persons aged 16-64 in the borough based on the baseline population forecasts, there would need to be an increase in the economically active rate and a decrease in the unemployment rate.' **In other words, in order to meet the employment projections, caused by our developments we will assume people will work longer (past typical retirement age) and assume unemployment nationally to be very low over a long period of time.** The ELNS makes huge assumptions that are bordering on being fictious.

04

3.18 In summary the Council's equation appears to be as follows:

- We need lots of warehouses to generate revenue.
- To justify this, we need to create a picture of high employment needs
- However, having done this we will not have enough employable people to meet the scale of warehouses we want to build, so to get around this we will make some wild assumptions about people working beyond their normal retirement age and booming national economy for the next 15 years to balance the demand.
- Once we've done all this, we can then justify the release of huge chunks of Green Belt, especially close to motorways and key trunk roads. Additionally, we can justify sacrificing strategic rail freight capability too because it is easier to attract warehouse occupiers than raise interest in constructing a freight terminal.

3.19 We would advocate that the above reasoning does in no way meet the 'special circumstances' requirements for release of Green Belt as defined in National Planning Policy. Promoting development for revenue purposes is not a sound reason for the release of Green Belt.

3.20 The Green Belt Review document included with the Draft Submission, Ref 3, builds on the fictitious employment demand calculations highlighted earlier and attempts to identify suitable land.

3.21 With regards Parkside East, page 51 of the Green Belt review states *'The 2018 SA concluded that development of the parcel for employment use would have a mixed impact on the achievement of SA objectives. Such development is likely to have a negative effect on air quality and biodiversity, as it would generate additional HGV vehicular movements within an existing AQMA and the parcel is only 144m from a SSSI.'*

3.22 Page 272, states *'Parcel GBP\_039 (Parkside East) continues to make a strong contribution to the purposes of Green Belt land.'*

3.23 Therefore, the Green Belt Review recognises the value of Parkside East as Green Belt. A plan produced by Network Rail in 2001 proposed building the freight terminal entirely on Parkside West, the site of the former colliery. By excluding Parkside West from use as a freight terminal, the Council have in effect forced a proposition to remove an important part of the Green Belt on Parkside East.

3.24 The Draft Submission lays out conditions of use for Parkside East in Policy LPA10. Para 4.36.6 states *'The TfN Freight and Logistics Enhanced Analysis Report (2018) forecasts that the amount of freight moved in the North of England will grow significantly between 2016 and 2050 (by 33% based on tonnes lifted or 60% based on tonne kilometres).'* As we have pointed out many times before such statistics do not differentiate bulk e.g. aggregates vs non-bulk freight. Parkside would not have any bulk capability typically therefore quoting such figures is erroneous and misleading. The paragraph should be removed or corrected.

3.25 LPA 10 also states *'The site is, due to its size (of over 124ha) also considered sufficiently large to accommodate other forms of Class B2 and B8 employment development on part of the area. However, for such uses to be accepted it must be demonstrated that the layout of the site as a whole would enable the effective development of a nationally significant SRFI or other form(s) of major rail-enabled employment use(s) on at least 60ha of the site. The figure of 60ha equates to the threshold above which an SRFI use is identified as being 'nationally significant' under the Planning Act 2008.'*

3.26 In effect the Council are saying here that a nationally significant location identified for use as a freight terminal can be reduced to just 60ha or less than 50% of its actual potential for

03 Parkside East and only 25% of its potential for the combined area of Parkside East & West in order to accommodate warehouse development. 03

#### 4 Summary

We would ask the inspector to examine the following areas based on our previous discussion herein:

1. Has the strategic nature of Parkside for use as a rail freight terminal been compromised?

03 a. Reduced freight terminal capability caused by not making use of the full potential of Parkside West (the actual site of the former colliery). In 2001 Rail Track produced a planning application for a freight terminal that was entirely based on Parkside West. The previous Prologis planning application in 2010 made use of both Parkside East and West and fully promoted inter-modal capabilities for the transfer of freight from road to rail. The Local Plan Draft submission makes no mention of inter-modal requirements of site occupiers for Parkside West. 03

b. Reduced freight terminal capability due to a reduction in available land from 227ha to just 60ha on Parkside East to meet further warehouse developments?

2. Does policy LPA 10 offer enough protection for the environment and impacts to the local community?

02 The currently adopted Core strategy CAS 3.2 condition 7 states '*7. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted if appropriate. The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity;*' This condition should be included in LPA10 and scoped for both Parkside East and West. 02

CAS 3.2 condition 9 states '*9. Impact on Green Belt and landscape character is mitigated by significant landscape and green infrastructure enhancement, including tree planting;*' This condition should be included in LPA10 and scoped for both Parkside East and West. 02

02 The CAS 3.2 condition 11 states '*11. Special regard should be had to the desirability of preserving the Listed Buildings at Newton Park Farm, their setting or any features of special architectural or historical interest which they possess. Should a suitable SRFI scheme require the removal of the Listed Buildings then substantial public benefits will be required including the relocation of the listed structures in a rural setting within the vicinity of Newton-le-Willows and preferably within the St. Helens local authority area;*' This condition should be included in LPA10 and scoped for both Parkside East and West.

02	Local roads pass through AQMA. Some key routes have high foot fall and are used by parents and children to get schools and shops. Increased traffic caused by road freight developments will have negative impacts on air quality and people's health, hence the need to place some protection in the plan for this.	02
07	3. Do the ELNS employment demand calculations actually stack up? The employment demand should be just enough to meet the needs of the borough and not artificially inflated to purely to generate higher revenues whilst producing significant environmental impacts and loss of Green Belt.	LPA 04 07 Sites 7EA & 8EA
08	4. Have the Council properly considered the views of the local community? Many thousands of objections have been raised over the last 20 years concerning loss of Green Belt and inappropriate development proposals. These appear to have been largely ignored by the Council.	LPA 10 08 Sites 7EA & 8EA
03	4.1 PAG would ascertain that the Local Plan is unsound for the following reasons: • The strategic nature of the Parkside site has been compromised by over focussing on warehouse development and reducing the potential capacity and flexibility for a freight terminal. [Not consistent with National Policy – protection of Strategic Sites]	03
07	• Over-inflated employment demand calculations distort the true requirement for employment land and therefore the need to release the amount of Green Belt proposed is inappropriate. [Not consistent with National Policy – Green Belt Protection]	07
09	• Building road distribution facilities adjacent to large areas of residential areas and making use of routes which pass through areas of high footfall, AQMA and close to an SSSI is not acceptable in terms of impacts to people's health and the environment. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts for what is proposed]	09 LPA 10 Sites 7EA & 8EA
10	• Too much development is focussed near motorways and major trunk roads in the borough causing a disproportionate impact to certain communities such as Haydock, Newton-le-Willows, Lowton, Golborne and Winwick. [Not positively prepared – not sustainable, unacceptably high environmental & health impacts]	10 LPA 10 Sites 7EA & 8EA
08	• Objections to inappropriate development at Parkside by a number of public bodies including PAG have largely been ignored by the Council. [fails duty to cooperate]	08
11	The Plan should be modified to be more aligned with CAS 3.2 in the adopted Core Strategy which protects Parkside for nationally strategic use whilst at the same time including conditions to reduce impacts to the local community and the environment.	11 LPA 10 Sites 7EA & 8EA

RO1778



St. Helens Council

05 APR 2019

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

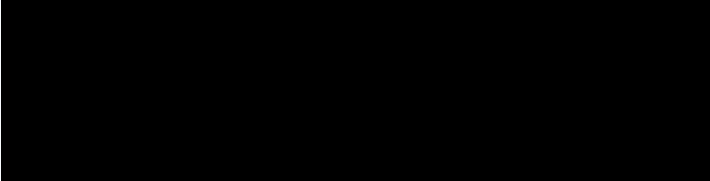
**Part B - Your Representation(s)**


## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

958

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: _____
First Name: <u>JUNE</u>	First name: _____
Last Name: <u>TYRER</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>202 REGINALD ROAD</u> <u>ST. HELENS</u>	Address: _____
Postcode: <u>WA9 4HZ</u>	Postcode: _____
	Tel No: _____
	Mobile No: _____
	Email: _____

Signature:  Date: 27/3/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

RO1779

05 APR 2019

Ref: LPSD



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

959

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>DAVID</u>	First name: .....
Last Name: <u>TYRER</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>202 REGINALD RD</u>	Address: .....
Postcode: <u>WA9 4HZ</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: [Redacted] Date: 27.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.



RO1780

① - LPA04    ② - LPA05    ③ - GEN  
 ④ - IDP    ⑤ - Para 1.7.2 DTC

**Representor Details**

Web Reference Number	WF0289
Type of Submission	Web submission
Full Name	Ms Claire Tyrrell
Organisation	
Address	17 Brooklands Road Eccleston St Helens WA10 5HE
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA 06
Paragraph / diagram / table	Table 4.8
Policies Map	10, 13 & 14
Sustainability Appraisal / Strategic Environmental Assessment	Sustainability Appraisal 2019
Habitats Regulation Assessment	Page 88
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

It is not justified because the plan is based on flawed methodology. It is not effective because it is not deliverable. It is not consistent with national policy because it does not comply with NPPF 2018.

**7. Please set out modification(s) you consider are necessary**

the requirement for Sustainable development

- the criteria for Sustainable transport as the plan promotes increased car dependency remote from transport hubs.
- sustainable housing, targets proposed are based on aspirational employment growth predictions.
- effective land use by concentrating on Green Space development over town centre development with higher densities.
- food security by ignoring Agricultural Land Quality.

In addition, the following fundamental elements of the Plan remain questionable -

- Economic growth predictions for St Helens are based on flawed historical data that does not justify the aspirational targets included in the plan.

\_\_\_\_\_

③

\_\_\_\_\_

①

- Adequate regional and cross border collaboration has not been undertaken. (5)
- The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.
- The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.
- The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.
- The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated. (2)
- The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15-year plan period or the 25-year safeguarded period being considered.
- The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered. (3)
- The Borough has significant long term and intractable problems at Windle Island, Bleak Hill Road, Skew Bridge in Rainhill, M6/J23 and M6/J21-26. The Infrastructure Delivery Plan (IDP) refers to current road improvements but does not outline how local and borough wide road improvements are to be made and funded. The Plan promotes unsustainable traffic growth causing severe traffic issues that will not satisfy the NPPF (2016) (4)
- The increase in traffic proposed in the Plan will have a significant impact on air-quality, noise, tranquillity and general health. It does not promote less vehicle dependency with its proposals for edge of town developments. (3)
- The IDP fails to explain the impact on Healthcare and Education. The current situation is touched on broadly, but how this will be managed and funded is missing or vague. There is no indication or reference to collaboration with the Hospital Trust, local CCGs or education authorities. (4)

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/9/2019 5:36:51 PM
---------------	---------------------

RO1781



St Helens Council

12 MAR 2019

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD (For official use only)

Please also read the Representation Form Guidance Note that is available with this form, or online at www.sthelens.gov.uk/localplan.

Please ensure the form is returned to us by no later than 5pm on Wednesday 13th March 2019. Any comments received after this deadline cannot be accepted.

This form has two parts; Part A - Personal Details Part B - Your Representation(s).

PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

Table with 2 columns: 1. Your Details, 2. Your Agent's Details (if applicable). Includes fields for Title, First Name, Last Name, Organisation/company, Address, Postcode, Tel No, Mobile No, Email.

Signature: [Redacted] Date: 11.3.19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes [ ] (Via Email) No [ ]

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: **Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)**

**or** by e-mail to: **[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)**

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### 3. To which part of the Local Plan does this representation relate?

Policy	Paragraph / diagram / table	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
<input checked="" type="checkbox"/> LPA 05 <input checked="" type="checkbox"/> LPA 06				
Other documents (please name document and relevant part/section)		INFRASTRUCTURE DEVELOPMENT PLAN GREEN BELT REVIEW 2018		

### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> *
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### 5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

SEE ATTACHED NOTES

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

*See ATTACHED NOTES*

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.



Dear Sirs,

I write to you to object to the St.Helens Local Plan ( 2018 ).

① Why is a figure of 486 houses per year forecast , the office for National Statistics suggestion for 2014 is 468 and from 2016 it predicts 383 hoses per year. I would have thought using the latter updated figure would be more appropriate for such an important plan which is spanning 15 years . Surely using this latter updated figure would be more appropriate for such an important plan which is spanning 15 years.

Contaminated brown field sites have been identified by St.Helens Council covering 3170 hectares but only two of these sites at 6HA ( 31.09 hectares) and 9HA ( 12.39 hectares ) have been identified as suitable for housing . ②

The council claim that some of the Brownfield is not suitable to be built on, **however with effort and focus a lot of that land can be built on.**

I sight the nearby town of Widnes which some 20years ago had over 30 chemical factories and now there are just a few. As a result of closures there has been a lot of contaminated land been cleaned up and developed for housing and some of the clean up was very extensive because of chemical spillage.

It does show if St. Helens council had the same determination as Widnes a lot of the Brownfield sites could be used for development and negate having to take good quality Green Belt land .

I understand the council are now working with Melton Mowbray council to try and formulate ideas for recovering Brownbelt land for development.

**Why didn't St. Helens Council start work on recovering contaminated Brown belt land before the plan was submitted? It is an admission that they were at fault in not taking brown belt recovery seriously enough before the plan submission.**

Traffic management in the area of 8HS has been a major problem for many years and even taking into account alterations currently taking place at Windle Island (which are only designed to try and improve traffic efficiency as they are now) will not be anything like enough to give good traffic management if the plan goes ahead because it does promote unsustainable traffic growth.

By unsustainable growth I mean 1000 plus vehicles into the road systems as a result of the plan with no details given on how this extra traffic is to be handled.

Very little attention has been given to road access to site 8HS. There is only one narrow country road which the plan says can be widened with egress via a roundabout onto the A580 but clearly this has not been looked at in any detail as such a roundabout is in very close proximity to an existing roundabout and such a proposal would cause further congestion on the A580. The only other access is by side roads through the existing housing estate which is not desirable at all.

The plan does not address this major issue in any detail.

Because of the likely increase in vehicle activity from the plan there is likely to be a significant impact on air quality, noise and general health, but the plan hardly touches on this.

The plan does not explain what the impact on education and health care will be. There is some mention of an expansion to Bleak Hill School for 8HS but this is only to rectify current placement issues, there is nothing in the plan to cover the education needs of an extra 1000 homes.

Again on Health Care it mentions a new Doctors surgery currently being built in the area covering 8HS but this is only to cover current needs – there is very little mentioned about the health needs of an extra 1000 homes.

The land at 8HS is grade 1 and 2 agricultural land and has been farmed for over 150 years and it has been land that is enjoyed by the residents of the area, with its many footpaths. If this land is taken for housing leisure walking would be restricted to land towards the village of Rainford which means crossing the busy A580 and the local Crematorium and cemetery – which is hardly ideal.

The Habitats Regulation Assessment process has suggested that parcel of land 8HS provides a habitat for bird species connected with European protected sites. Any proposed development would need to be informed by a suitable ecological study informed by wintering bird surveys – the plan does not address this.

In analysing the plan it suggests that the release of green belt land is to reduce the costs of the development so that the affordable housing target is achieved. This obviously does not meet the exceptional circumstances justification for releasing greenbelt.

For the reasons I have outlined I would suggest the 2018 local plan is unsound and needs modification. As I have already mentioned the housing target figures should be reduced; the plan should only consider the 15 year period and thus negate the requirement for safeguarded sites and in conclusion the “exceptional circumstances” for releasing greenbelt should be carefully applied.

RO1782



St. Helens Council

12 MAR 2019

Ref: LPSD

(For official use only)

St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Please also read the Representation Form Guidance Note that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us by no later than **5pm on Wednesday 13th March 2019**. Any comments received after this deadline cannot be accepted.

This form has two parts;  
Part A – Personal Details  
Part B – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Sandra	First name:
Last Name: Upton	Last Name:
Organisation/company: Resident	Organisation/company:
Address: 18 Crantock Grove Windle St Helens Postcode: WA10 6EJ	Address:
	Postcode:
	Tel No:
	Mobile No:
	Email:

Signature:

[Redacted Signature]

Date:

10/3/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

**RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

#### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

#### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

#### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.  
Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA05 LPA06	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				Infrastructure Development Plan Green Belt Review 2018			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

**Part B: 6. The Local Plan is not legally compliant and is unsound**

**Legally Compliant : Questionable at the very least!**

S20 (5)(c) of the Planning and Compulsory Purchase Act 2004 requires that the Local Plan complies with a legal requirement to consult with the local community. Although, on paper, this may seem to have been achieved, there was a distinct lack of transparency in the early stages of revealing the plan. The initial Preferred Options Local Plan Consultation was timetabled to take place from the 5<sup>th</sup> December 2016 - 30<sup>th</sup> January 2017 (i.e. to include the Christmas and New Year period when many people are otherwise occupied). It was extended to the end of January after complaints that the Council were trying to push it through with little opposition. In reality, the letters were only sent out to the public on the 15<sup>th</sup> December and many were not received until the 19<sup>th</sup>, meaning two weeks had already elapsed before residents could even start to consider the document which was complex and lengthy. No public meetings to disseminate information were organised by the Labour Council. It was left to a small number of opposition councillors who took the initiative to inform residents as to what was happening.

The Local Plan Scoping Consultation Document 2016 should have been published as part of the additional documentation to the Preferred Options plan as this focussed on Green Belt and many

comments were made by members of the public. However, it was only released 5 days before the close of consultation after public request. I was personally was not aware of the Scoping Document of 2016. We had not been informed of its existence and had no knowledge the Green Belt was being reviewed. As there were only 212 replies to the consultation it suggests not many people were in the know.

The actual **Comment Form** for the Preferred Options Plan was difficult to understand deterring many from responding. However, after a public outcry it was finally agreed to also allow comments via letters or e-mails. Nearly 6,000 responses were ultimately received of which 97% voted against.

The general policy behind the Plan appeared to be motivated by the ruling labour council to allow the release of large amounts of Green belt land for easy development instead of encouraging Brownfield first. Indeed, our own Ward Labour Councillors did very little to inform or help local residents who would be directly affected by the proposals if the document was accepted. Because of the public outcry some changes were made to produce the **Local Plan Submission Draft** but there are still many issues present that I believe make the current local Plan unsound as detailed below.

The **lack of transparency** by the Council in the initial stages of the draft Local Plan suggests that the **legal requirement to consult with the local community as required by the NPPF 2018 has not been met.**

#### Failure to meet the Soundness test:

##### The Plan is Not Positively prepared:

The plan **does not achieve sustainable development** (development that meets the needs of the present without compromising the ability of future generations to meet their own needs):

1. **Inflated Housing Need Figures:** The Council are using a forecast for minimum average housing need from the 2014 ONS figures of 486 houses per year, yet the latest estimate produced by the Office for National Statistics in 2016 predicts that only 383 houses per year will be required to meet housing need in St Helens. Using a more accurate figure would mean Brownfield sites rather than release of Green belt could accommodate the need.
2. **No requirement to safeguard land-'only where necessary':** The Council have identified several sites as 'safeguarded' to meet development needs after 2035 stating that the NPPF requires this when undertaking a green belt review to meet longer term development needs. However the NPPF actually states that local authorities should safeguard land only where necessary. It is not a requirement that land should be safeguarded for development although some authorities seem to think otherwise. In fact this was discussed in parliament (Official Report, 24 October 2013; Vol.569, C.193WH) where Nick Boles MP then Under Secretary of State for Communities and Local Government stated: '*there is nothing in the Localism Act 2011, in the NPPF or in any aspect of Government planning policy that requires someone to plan beyond 15 years. So anybody who is suggesting there is any requirement to safeguard land for the future development between 2030 and 2050 is getting it wrong*'. Once land has been removed from green belt it is effectively gone forever as development is practically guaranteed to occur on the site at some point in the future where Local Authorities give in to pressure from developers. How can Local Authorities accurately predict housing and employment needs in 20 to 30 years time? It is nonsense and **cannot meet the areas objectively assessed needs.**

I currently live opposite a large parcel of land that has been designated as 'safeguarded' for development after 2035 i.e. parcel 8HS (land south of A580 between Houghton Lane and Crantock Grove, Windle). The land has been designated as *safeguarded for potential housing development after 2035 and planning permission for permanent development should only be granted following a future local plan review*. However, under the NPPF 2018 local plan reviews should occur every 5 years. A builder already has an option on the land and is unlikely to wait 15 years for it to come to fruition. As residents, we will be forced to live under the shadow of a potential development (1000 houses) on our doorstep which could happen at any time following the local plan review.

**Parcel 8HS should not be released from the Green belt.** It is Grade 1 Agricultural land having been farmed since 1850 and is enjoyed by many local residents who use the numerous footpaths for walks and well being. It is the only accessible green space in the Windle area. If this is built upon residents would



have to cross the very busy A580 to access open countryside or use the grounds of the Crematorium to walk their dogs. Neither option is desirable or practical. The traffic problems that would result from cars generated by the proposed 1000 new homes feeding into the A580 at Windle Island and the already congested local roads would be intolerable. The estate would completely alter the nature of the area, likely creating a dormitory community, on the outskirts of the town, for commuters to Liverpool or Manchester. **'Safeguarding' the land and thereby removing it from the protection of green belt will only serve to attract greedy developers who will not have to show 'very special circumstances' to build.**

### 3. **The Green Belt Review 2018 is fundamentally flawed and biased towards developers.**

The methodology states that 'the Government has not set any prescribed method for conducting a Green Belt Review but in common with other authorities has followed a step by step approach'. Their method involved looking at parcels of land for their contribution to purposes 1-3 of Green Belt (Stage 1B) but also looking at the degree to which those parcels would contribute to development needs if released from Green Belt (Stage 2B). They state *parcels with good development potential are those that would be highly likely to come forward for development within the plan period*. This suggests development takes priority over retaining Green Belt status. Constraints were looked at in Stage 2A but were often played down if development potential was good:

To illustrate the above- when assessing the land between Crantock Grove and Houghtons Lane (now designated 8HS) the report found that despite having well defined boundaries *'it would form a sizeable extension of the urban area into the countryside'*. **Does this statement not encapsulate the concept of 'Urban sprawl'?** The prevention of urban sprawl is defined as the first purpose of green belt in the NPPF Ch13 s134. The methodology required a grading classification of the land to help minimise loss of high quality agricultural land. Parcel 8HS was found to be high quality (grade 1 & 2). The methodology also stated that sites should avoid creating local infrastructure problems yet 8HS was found to need significant improvements to highways infrastructure and significant improvements to public transport facilities. Constraints included possible requirements for the creation of another primary school and upgrades to social infrastructure and amenities. Only 65% of the 55Ha could actually be developed due to constraints caused by the closeness of the A580, a local brook running across the land and two UU pipelines. However the land was still chosen to be removed from the Green Belt register albeit 'safeguarded' to meet housing needs beyond the Plan. A developer had already taken out an option on the land and it would appear that factor has taken precedence over keeping the land as Green Belt. **The plan has not been positively prepared nor does it satisfy the Governments requirement of release only in exceptional circumstances.** The methodology used has been geared towards speculative development opportunities rather than the 5 purposes of GB stated in the NPPF. The fifth purpose is to *'assist in urban regeneration by encouraging the recycling of derelict and urban land'* but the method used in the review is not encouraging that purpose. Developers are obviously keen to take green spaces rather than clean up Brownfield sites in urban centres.

#### **The Plan is Not Justified:**

**1. Safeguarding land.** As already stated above the Council cannot accurately predict employment or housing needs for the next 30 years so how can they justify 'safeguarding' an additional 155 HA for development beyond 2035 thereby removing the protection of green belt status from land that might never be required.

**2. The Brownfield register.** The plan makes no mention of Brownfield and Previously Developed Land that is not yet available or included on the Brownfield register. There are large areas of Contaminated Land sites in St Helens that are being ignored. This will only detract from regenerating the town and make it harder to attract new residents. Similar contaminated sites in Prescot (the old BICC works) and Widnes (where land had housed several Chemical factories) have been decontaminated and used for development. Why can't St Helens show such innovation? Instead the Council is proposing to allocate two Green belt sites of 49ha (3HS) and 53 ha (8HS) contributing to a total of 148ha to be removed from Green Belt into 'safeguarded land' to fulfil the housing need. This does not make sense and **cannot be justified.** Developers will obviously take the easy option of building on Grade 1 Agricultural land rather than clean up Brownfield sites.

**3. Job losses if Agricultural land is developed.** The loss of grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites has been ignored yet this will result in loss of jobs and a loss to the local economy from the produce they create

### The Plan is Not effective

1. **The Infrastructure plan (IDP) and LPA07 & LPA08 are not effective.** The proposals put forward in the Draft Local Plan would create massive increase in vehicles on already congested roads. The IDP concentrates on projects that are already under way rather than how it would mitigate and fund the future issues that the Local Plan would create. For instance, the current Windle Island Junction scheme due for completion in 2019 at a cost of £7m, is aimed at easing congestion at the junction between the A580 and A570 - a well known bottle neck. In reality, although there will be some immediate improvement it is unlikely to fully solve the problem. There will be even greater traffic flow at that junction from HGV's once Liverpool's Super Port becomes fully operational together with traffic from the ever increasing number of warehouses being built along the A580 corridor and from the developments planned for neighbouring West Lancashire. Add to this the potential additional 2000 vehicles that could arise if 'safeguarded' site HS8 is developed with a knock on effect to the local roads such as Bleak Hill and Rainford Road and the area will be gridlocked. Although the IDP refers to some of these issues it does not detail how these problems will be resolved or funded. Many of the solutions are quoted as TBC. At best, the plan is aspirational.
2. **The St Helens Local plan is broadly one-dimensional.** It relies on private developers and a buoyant housing market to achieve its objective. However what happens if all these proposed houses fail to sell? If the economy takes a downturn what commitment would those developers have to St Helens. The employment opportunities all seem to revolve around Warehousing and logistics and it fails to address other types of job creation. In other areas where Warehouses have been built companies have relocated to fill them but also brought with them their own staff creating minimal employment opportunities for the local community. Warehousing also requires vast amounts of land which seems mainly to be earmarked for Green Belt in the Local Plan. If the Warehouses remain unused that Green belt has been wasted. Under the NPPF Green belt release should only be allowed in exceptional circumstances. Those exceptional circumstances have not been proven.

### The Plan is not Consistent with national policy:

1. **It does not put use of Brownfield first:** The plan cannot be said to be consistent with national policy. The framework recommends use of Brownfield first to help regenerate urban areas but the Local Plan seems to be concentrating on use of Green Belt by arguing there is not enough of the former to meet demand. Due to the industrial history of St Helens there are many hectares of derelict Brownfield land that are in need of regeneration but if development is allowed to use Green Belt first then regeneration and economic growth will not occur.
2. **The Green Belt Review methodology is developer led.** The methodology for determining which sites should be released is flawed. It is using a developer led system rather than approaching it on a case by case basis. The process appears to have started by asking land owners to come forward if they were willing to sell and then looking for speculation advance by developers. Using the 2018 Green Belt review the 5 key purposes of Green Belt seem to have been assessed to fit in with those areas showing developer interest (as illustrated in my earlier comments under Green Belt methodology). Using that method conflicts totally with Green Belt purpose 5 ( Ch 13 s134 NPPF): 'to assist in the urban regeneration by encouraging the recycling of derelict and urban land'. Developers should not touch Green Belt land whilst Brownfield sites are available.
3. **The Infrastructure development plan is poor and incomplete.** It addresses current problems and areas where mitigation is already taking place but although it lists a lot of the perceived future threats to highways, education, health etc. it gives only vague ideas on how they would be dealt with and funded. This is not consistent with national policy

Based on the reasons I have given above the Local Plan has **NOT** been: Positively Prepared, Justified or Effective and is not consistent with national policy. **It is NOT SOUND.**

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Part B: 7. To make the plan sound:**

- Use the standard method for determining housing need to avoid unrealistic targets
- Investigate ways of decontaminating some of the lower quality Brownfield sites to enable them to be brought onto the Brownfield register
- There is no requirement to have 'safeguarded' land in the Plan. The NPPF states 'only where necessary' and the plan has not shown it is necessary. Such sites should stay in Green belt.
- The Infrastructure Plan is incomplete and superficial. In particular, it does not address how the local transport system would deal with all of the additional traffic (commercial and residential) or who would fund the new roads. Other aspects of infrastructure (e.g. educational establishments, local amenities, health etc.) need much greater research and explanation for mitigation and funding.
- Investigate other employment opportunities that could be brought to St Helens rather than concentrating purely on Warehousing and Logistics which are unlikely to generate sufficient employment options for local people.
- I do not believe the exceptional circumstances to justify release of green belt land have been shown. The methodology that was used for determining which parcels of land should be released does not conform to NPPF. It appears to be a developer led criteria rather than an objective test of the 5 purposes. Other reasonable alternatives have not been fully explored including lower target figures and using more previously developed land. These alternatives will have less impact on the environment and reduce the need for new infrastructure.

SHBC should amend the plan by retaining the Green Belt, reducing the housing and employment targets and allocating more previously developed land.

Please continue on a separate sheet if necessary

***Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.***

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>x</b>	<b>No, I do not wish to participate at the oral examination</b>		<b>Yes, I wish to participate at the oral examination</b>
----------	---	--	---

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1783

LLO069

Site BHA

① - LPA05

② - DEC

③ - S.A.



Residential and industrial building within Rainford . Objections to planning .  
lan to: planningpolicy

11/03/2019 21:27



St Helens Council,

I send this email as a follow up to my previous submission. I am disappointed that you have chosen to continue with your chosen path of building within the Rainford area and set out my objections as follows.

I have read with interest your latest version of the Local Plan. It seems to me that St Helens council are being deliberately over optimistic in the requirement for housing within the borough based upon an expectation that the recent declining trend for people to live within the borough will reverse by developments outside of it. However specifically In respect of the overall figures within the Plan;

1. It would appear that you are extolling that there are exceptional circumstances to justify not using the standard method to calculate housing need. There are no exceptional circumstances.

10

2. Therefore your economic analysis appears to be flawed and, based on my previous submission, you make over-optimistic assumptions about the role St Helens will play within the Mersey Gateway. We have, as a borough, continued to see a decline in the numbers of people living, and wanting to live, within St Helens. Therefore, again, the level of land required will be lower than you estimate and certainly lower than set out in the Local Plan.

10

3. It therefore follows on that if the requirement is lower than you artificially inflate, there are no exceptional circumstances to change Green belt boundaries within the borough bearing in mind that, it would appear that other reasonable alternatives have not been fully explored. This would include being realistic in setting lower target figures and using more of the previously developed land that exists within the borough. More work needs to be undertaken on utilising brown field sites before Grade 1 farming land is destroyed.

10

4. There is no doubt that Rainford currently lacks the infrastructure to support another 249 houses of the size that will no doubt be built. The current road structure barely copes with the current traffic, with multiple accidents occurring at Mill Lane/Higher Lane and regular blockages within Pasture Lane. Without significant investment with infrastructure and services, Rainford will cease to be function and those services available will be insufficient for the communities needs.

10

5. Little or no consultation appears to have been undertaken with other locally based Councils in respect of a regional requirement. There are already many building programmes underway in surrounding areas and a massive development envisaged by West Lancashire that will see Rainford more or less joined with areas within their catchment. With very limited infrastructure in these proposed areas, Rainford will be the nearest focal point for people living within this proposed catchment area. I have not seen a statement of common ground that shows good faith as to how this housing and industrial jigsaw will ensure that the over provision of housing and industrial areas will not be out of synchronisation with actual realistic demand.

10

6. In relation to the specific site HA8 (Rookery Lane), I make the following points;

This area is Grade 1 agricultural land, farmed continually and producing valuable resources for the local and national population. In an uncertain time of Brexit, we cannot afford to limit our ability to produce our own food within the agricultural sector which are threatened by the proposed removal of this site from the Green Belt. The St Helens Local Plan is intended to promote employment and economic growth yet this will have the opposite effect. There has been no consultation with Natural England over the loss of Grade 1 Agricultural (BMV) Land. (0)

This site is next to an Industrial area and subject to the risks associated with industrial activity such as pollution and even explosions, both of which have been recorded recently. Other sites have been excluded during the site assessment phase due to being next to similar industrial employment land - for example see SHLAA 2016 site assessment ref 16m & 142.

Only four sites score four negatives (red grading) on the Sustainability Appraisal, and the other 3 have all been discarded. So St Helens Borough Councils's own assessment is that HA8 (Rookery Lane/Higher Lane) is the least appropriate Green Belt site allocated for housing in Phase 1. There appear to be double standards being applied, sceptically I would appraise for financial benefit (increased Council Tax revenue). (8)

For these reasons and unless the plan is significantly modified it should fail both the legal tests it has to pass and the tests of soundness.

Thank you.  
Ian Valentine  
3 Sandon Grove  
Rainford  
WA11 8AU

Julie Valentine  
3 Sandon Grove  
Rainford  
WA11 8AU

Sent from my iPad

RO1784



**Representor Details**

Web Reference Number	WF0216
Type of Submission	Web submission
Full Name	Mr David van der Burg
Organisation	
Address	3 Peach Grove Haydock WA11 0GB
Agent Details	,

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LPA05 site 2HA
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Population growth estimates are national, not at all relevant to St Helens where the population is in decline. Even if there were a need for more housing, there is plenty of brownfield land available. Green Belt areas are supposed to prevent urban sprawl. The proposed development goes completely against that national policy. There are no plans for more GPs, schools, or local amenities of any variety. The proposals will add another 1000 people and a similar number of cars without any extra provision for the needs of these people. It is just encouraging the use of Haydock as a dormitory for Manchester and Liverpool, putting up house prices beyond the reach of locals. Plus this is an area which is already prone to flooding - give it a couple of severe floods on the new housing estate and home insurance will become prohibitive, then you end up with a blighted estate.

**7. Please set out modification(s) you consider are necessary**

Do not remove site 2HA from the Green Belt.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/11/2019 7:02:30 PM
---------------	----------------------

RO1785



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**

Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1033

13 MAY 2019

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>JULIE</u>	First name: .....
Last Name: <u>VARLEY</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>287 MILL LANE</u>	Address: .....
<u>SUTTON LEACH</u>	.....
<u>ST HELENS</u>	.....
Postcode: <u>WA9 4EY</u>	Postcode: .....
[Redacted]	Tel No: .....
[Redacted]	Mobile No: .....
[Redacted]	Email: .....

Signature: ..... [Redacted] Date: 9/5/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

### Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

- Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1786

① - LPA05    ② - GEN    ③ - Para 1.7.2 DTC

**Representor Details**

Web Reference Number	WF0191
Type of Submission	Web submission
Full Name	Mrs Susan Vaudrey
Organisation	
Address	8 laurel drive eccleston WA10 5JD
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	No

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

The latest estimate produced by the ONS (2016) predicts that 383 houses per year will be required to meet housing need in St Helens. The Council are using an older forecast (2014) of 486.

The Plan makes no mention of Brownfield and Previously Developed Land (PDL) that is not (yet) available or included on the Brownfield Register.

The St Helens Council statement of "Contaminated Land (CL) sites" (2015) indicates that 3,170 ha of the lowest priority contaminated land exists in St Helens. Two Green Belt sites of 56.6 ha and 148 ha are being reclassified as safeguarded land sites and included to fulfil the housing need, much less than 7% of the 3,170-ha available, if it were to be remediated.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package

③

①

includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so.

The council in conjunction with Liverpool City Region Combined Authority (LCRCA) and neighbouring authorities have no policy for bringing 'unsuitable' sites outside the Brownfield Register back into use. It is not reasonable to assume that sites cannot be made available within the 15- year plan period or the 25-year safeguarded period being considered. Evidence as the examples identified above dictate otherwise.

The loss of Grade 1 and 2 Agricultural land that comprises most Allocated and Safeguarded sites is not mentioned. The negative impact on farming and distribution jobs is not considered.

The local road networks, health service, schools, policing, public transport, cannot support the massive expansion of housing into otherwise farming land.

The Plan is not effective.

1

2

**7. Please set out modification(s) you consider are necessary**

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 10:50:56 AM
---------------	-----------------------



RO1787

① - LPA05    ② - LPA06    ③ - Para 1-7.2 OTC

**Representor Details**

Web Reference Number	WF0192
Type of Submission	Web submission
Full Name	Mr john vaudrey
Organisation	
Address	8 laurel drive eccleston WA10 5JD
Agent Details	john vaudrey

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

**3. To which part of the Local Plan does this representation relate?**

Policy	LA05
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

**4. Do you consider the St Helens Borough Local Plan 2020-2035:**

Is legally compliant?	Yes
Is sound?	No
Complies with the duty to cooperate?	Yes

**5. If you consider the Local Plan is unsound, it because it is not:**

Positively prepared, Justified, Effective, Consistent with national policy

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.**

The Green Belt Review (2018) contains dodgy decisions, based on comments from developers rather than the opinion of local people and facts. Land initially labelled HA16, now 8HS, is Grade 1 and 2 agricultural land. This appears to be given greater weighting in other decisions than it has in this case. Sustainable infrastructure has not been addressed and will cause problems if this site is allowed to be safeguarded for development. The decision to include this parcel in the review leads to significant doubt that the Plan has been positively prepared.

Recognising that St Helens Council has used the ONS(2014) statistics upon the advice of government is disappointing when later, and more accurate, statistics (ONS(2016)) are available. The Council are aware of the reduction in housing need but still choose to add an economically based uplift to the older figures, resulting in unnecessarily high housing targets. Reducing the identified need to the truer figure will reduce the requirement for building on Green Belt. The Plan is not justified.

The lack of infrastructure and the poor education offer means that St Helens is not a desirable place to live. The Plan does not address these essential areas of need and concentrates, instead, on house building and low skilled employment. The problem is exacerbated by allocating Green Belt for housing in areas where there is a lack of suitable infrastructure and the type of houses will not meet the housing need.

②

①

Adequate regional and cross border collaboration has not been undertaken. The Housing Need assessment does not use Standard Methodology, and no case for exceptional circumstances has been made.

It is ridiculous to give up green belt land when so much brownfield land is available within the borough, land that should and can be remediated. As a former mining town to develop housing in the past, remediation has been required - examples are the former Providence Hospital site, the Cansfield Street laundry site and the home of the Shires housing development required extensive remediation - but it was done. Why should the council give up our heritage of the green belt to quick profit making housing developers and leave large plots of brownfield sites fallow. The plan should look to develop those brownfield sites with the housing developers part of the package includes the land remediation - look at what Knowsley Council have achieved with the former BICC sites, most of which were highly contaminated. It can be done if there is a willingness to do so. The Plan is therefore not effective.

**7. Please set out modification(s) you consider are necessary**

Retain all Green belt areas for the future of our communities.

Re-develop brownfield sites - it can be done and there is plenty of evidence within the existing projects in the borough and neighbouring authorities that are excellent examples of this, even ongoing ones now. If this action is not taken it will leave large areas of the borough barren brownfield deserted sites, whilst our beautiful green belt is gone for the benefit of house builders and the council wanting to make a quick profit rather than rejuvenating exiting brownfield sites.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/12/2019 10:47:47 AM
---------------	-----------------------

RO1788

EFO043



St.Helens Borough Local Plan 2020-2035: Submission Draft

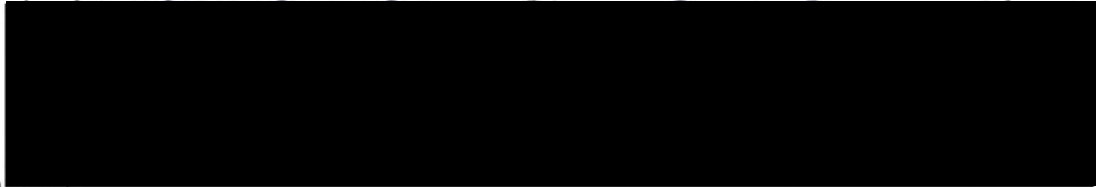
Victoria Vernon

to:

planningpolicy@sthelens.gov.uk

12/03/2019 15:37

Hide Details



1 Attachment



SP\_19\_00000483\_St Helens LP\_lpsd-representation-form..doc

Dear



Please find attached Sport England's comments to the above consultation,

Kind regards,

Victoria Vernon BSc (Hons) MA

Trainee Planner



- ① - LPA05.1
- ② - LPA09
- ③ - LPC05
- ④ - LPD03
- ⑤ - LPA03



This girl can

Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Erin Stephens](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Erin Stephens, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Victoria	First name:
Last Name: Vernon	Last Name:
Organisation/company: Sport England	Organisation/company:
Address: Sport Park, 3 Oakwood Drive, Loughborough, Leicester,	Address:
Postcode: LE11 3QF	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

**Signature:** [Redacted] **Date:** 11/03/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

or by e-mail to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.



## Now please complete **PART B** of this form, setting out your representation/comment.

**Please use a separate copy of Part B for each separate comment/representation.**

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

#### 3. To which part of the Local Plan does this representation relate?

Policy		Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

#### 4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

#### 5. If you consider the Local Plan is unsound, is it because it is not:

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

#### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

LAP05.1 – Sport England supports the removal of 7HA & 13HA from the Local Plan. However, it has also come to light that further sites allocated are not policy compliant. Both 2HA and 10HA include land that is defined as playing field.  
An objection is made to these allocations as they would involve the permanent loss of community playing fields and outdoor sports facilities that are in active use. While the Council may have plans to relocate the facilities on both

①

sites as part of the developments this has not been clarified in the policy and no replacement sites have been identified. The loss of the facilities without replacement has not been justified by the Council's evidence base which demonstrates the sites are not surplus to requirements. As these sites contain important sports facilities which serve the community in the area, the loss of these facilities would be contrary to Government planning policy on playing fields/sports facilities set out in paragraph 97 of the NPPF.

Consequently, at this stage, Sport England would object to the potential allocation of this sites for residential unless (in accordance with Government policy) off-site replacement playing field provision was made to mitigate the impact through confirmation in the policy that the facilities will be replaced with equivalent or better replacement facilities in terms of quantity and quality prior to commencement of development and the proposed replacement sites are identified in the plan to provide certainty.

The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields. To avoid potential objections and delays at a later date should these sites remain allocated for development which may affect the delivery of the allocation, it is advised that discussions take place with Sport England before this site allocation is confirmed in the submission version of the Local Plan. Further advice can be provided on how our concerns could be potentially addressed as well as advice on how to avoid some of the problems experienced by other local authorities who have allocated playing fields for development in their local plans.

LPA09 – This policy refers to the council's Green Infrastructure provision.

Para 4.33.3 states that sports grounds and playing fields are included by this policy. The policy is not consistent with the council's evidence base. The council's Playing Pitch Strategy 2016 highlights deficiencies of almost 26 match equivalent sessions. However, paragraph 4.33.5 of this policy states that the council's open space study 2016 concluded that there is sufficient quantity of open space.

This part of the policy also provides a link to the open space standards in policy LPC05. However, policy LPC05 quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As Green Infrastructure includes playing fields it is important that policy LPA09 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

LPC05 - Table 7.1 referred to in policy LPC05 (part 2) quite rightly does not provide a local standard for outdoor sport. Instead the reasoned justification for that policy advises the Playing Pitch Strategy will provide a strategic framework to inform the protection, enhancement and provision of pitches and ancillary facilities. As outdoor sport is a typology of open space it is important policy LPC05 and its reasoned justification provides clarity around how playing field provision differs from other open space typologies.

As stated above, local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if you consider a tennis court, and up to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space

LPD03 - Outdoor sport is a typology of open space but Sport England would be extremely concerned if this policy included a requirement for onsite sports provision. A quantitative standard is not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court ranges from two people if a tennis court to 30 people if a full-sized adult rugby pitch. In addition, the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

LPA03: Part 5 – Sport England suggest strengthening of the policy to include physical activity opportunities within the design of new developments. Sport England has produced guidance in partnership with Public Health England that sets out ten principles to incorporate into design to promote physical activity. The Active Design Guidance can be found on Sport England's website.  
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

The recent change in Government thinking has led to the emergence of DCMS Strategy "Sporting Future: A New Strategy for an Active Nation". In response to this strategy Sport England has published 'Towards an Active Nation' which sets out how Sport England will work in partnership with a range of organisations, including Local Planning Authorities, to implement the Strategy.  
<https://www.sportengland.org/news-and-features/news/2016/may/19/sport-england-triples-investment-in-tackling-inactivity/>

LAP05.1 – Whilst the protection of these sites and the removal of the proposed allocations from the Plan would be an acceptable solution, as an alternative potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy.

LPA09 - Sport England suggest removing the reference to sufficient quantity of provision from this policy and amending para 4.33.5 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

LPC05 - Sport England suggest providing a new point within policy LPC05 to say, "The Playing Pitch Strategy, and any updates thereof, will provide the strategic framework to inform protection, enhancement and provision of pitches and ancillary facilities."

Sport England also suggests strengthening para 7.10 to say "Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. In addition, the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want

to participate in sport. The Playing Pitch Strategy and Action Plan, informed by a comprehensive Playing Pitch Assessment, has established the supply and demand for playing pitch facilities across the Borough in terms of usage and provision. The accompanying Playing Pitch Strategy and Action Plan identifies a series of sport by sport recommendations which provide a strategic framework for the protection, enhancement and provision of outdoor sports facilities." 3

LDP03 - It is suggested it is made clear within this policy that the onsite open space requirement does not include outdoor sport but that offsite contributions will be sought where the Playing Pitch Strategy identifies shortfalls in provision that would be exacerbated by the additional demand for sport generated by housing growth. 4

Please continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further *representations based on the original representation at the publication stage.*

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

EF 0043



**RE: St.Helens Borough Local Plan - Submission draft**  
Victoria Vernon to: Sara Jones

02/07/2019 09:31

History: This message has been replied to and forwarded.

Good Morning,

Thank you for your email. For clarification, The PPS Assessment shows that all currently used playing field sites require protection and therefore cannot be deemed surplus to requirements because of shortfalls now and in the future. Lapsed, disused, underused and poor quality sites should also be protected from development or replaced as there is a requirement for playing field land to accommodate more pitches to meet the identified shortfalls.

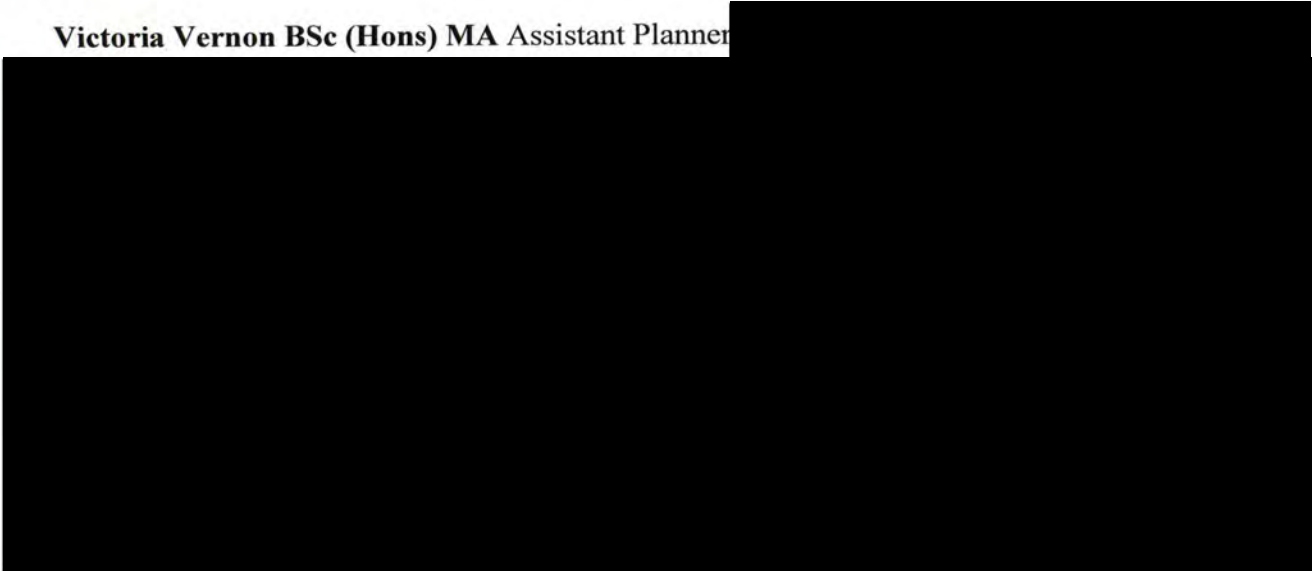
Therefore Sport England object to any allocation which contains playing field land being taken forward if the evidence is not put forward to justify either it's loss or replacement.

Sport England accepted the councils evidence presented last month that allocation 2HA that there is no evidence or reference of a cricket ground/pitch ever being on that site and the farmer has confirmed that he has ploughed that field in excess of 30 years and the feature which appears to be a cricket wicket is a concrete slab.

With regards to allocation 10A please refer to my previous comments dated 18th April 2018.

Kind regards,

**Victoria Vernon BSc (Hons) MA Assistant Planner**



Afternoon Victoria,

I am now just summarising your email for the Responses Report the Council are preparing, and I still need to clarify a couple of issues with you in regards to the proposed site allocations.

In the first line of your response you state that you support the removal of 7HA & 13HA, do you mean site 7HA formerly site HA13 in the Preferred Options (Red Bank School, Newton-le Willows), do you mean you support its removal from the Green Belt or do you think we have removed it as an allocation? We haven't removed it as an allocation and are still proposing it come forward as a housing allocation.

Further to my previous emails, we still haven't come to any conclusion in regards to sites 2HA and 10HA, for which I believe the Council have produced additional information for you to remove your objection to these two sites.

If you think it may be easier to clarify any points over the phone I am in the office all week (apart from Thursday), and will be happy to discuss the points you have raised etc..

Kind regards



Senior Planning Officer (Policy)  
Development Plans  
Development & Growth  
Place Services  
St. Helens Council



Afternoon Victoria,

Just to let you know that I carried out a site visit this morning and I can confirm that there is a concrete slab in that area. However, we can still find no evidence or reference of a cricket

ground/pitch ever being on that site and the farmer has confirmed that he has ploughed that field in excess of 30 years. There is an active Cricket Club in the area but it is further to the east near what was called Princess Pit by Peile Road off Wexford Close so I don't think there would have been a need for two cricket pitches so close together.

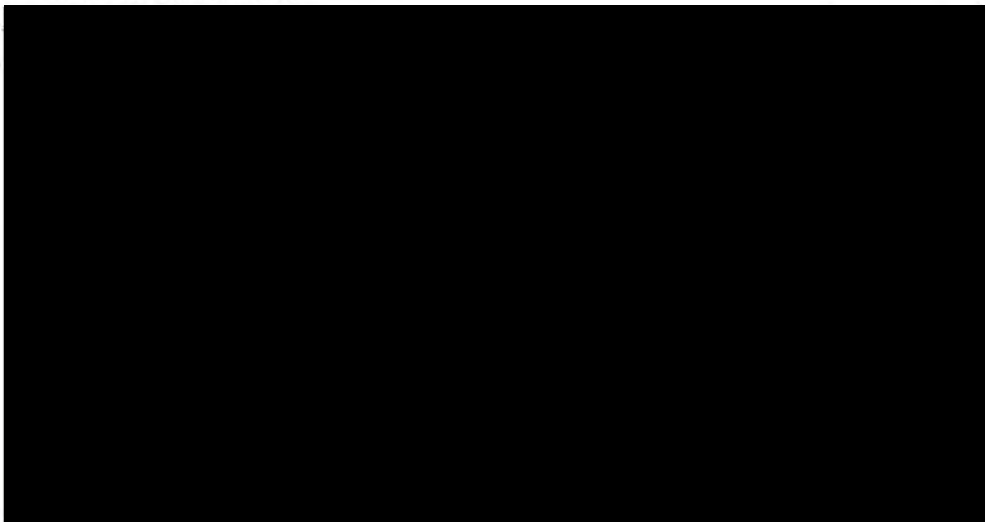
Interestingly though I have found information that suggests there are coal mining shafts in this field and one mapped very close to this specific location, so it is more likely that this is just a mine shaft cover.

If you have any further information relating to the site other than an image from google maps, then we would appreciate you providing it.

Kind regards



Senior Planning Officer (Policy)  
Development Plans  
Development & Growth  
Place Services  
St. Helens Council



Good Morning 

Thank you for contacting Sport England

In response to your queries, I provide the following comments.

Site 2HA (Land at Florida Farm (south of A580), Slag Lane, Blackbrook) – The below aerial image shows what appears to be the remnants of a cricket wicket circled in red.

[IMAGE][IMAGE]

Just because an area of playing field is not currently marked out with a pitch does not mean that it is materially no longer a playing field. It is capable of accommodating a pitch and aerial images provided below clearly indicates that it has been marked out with a pitch in the past. There is no positive obligation (under planning law) for any part playing field to be actively used as such. The Town and Country Planning (Development Management Procedure) (England) Order 2015 defines a playing field as ‘the whole of a site which encompasses at least one playing pitch’ the definition refers to the whole of a site and therefore does not just cover land which is currently laid out as pitches. This is because those other parts of a playing field are a resource which may be needed, now or in the future, and it is important that they are afforded the same protection.

I hope this clarifies Sport England’s position on the allocation.

Kind Regards,

**Victoria Vernon BSc (Hons) MA Trainee Planner**



Afternoon Victoria,

Further to my email of the 9th April, I'm just emailing again regarding the objections you raised to two of the sites put forward for allocation in the St. Helens Borough Local Plan.

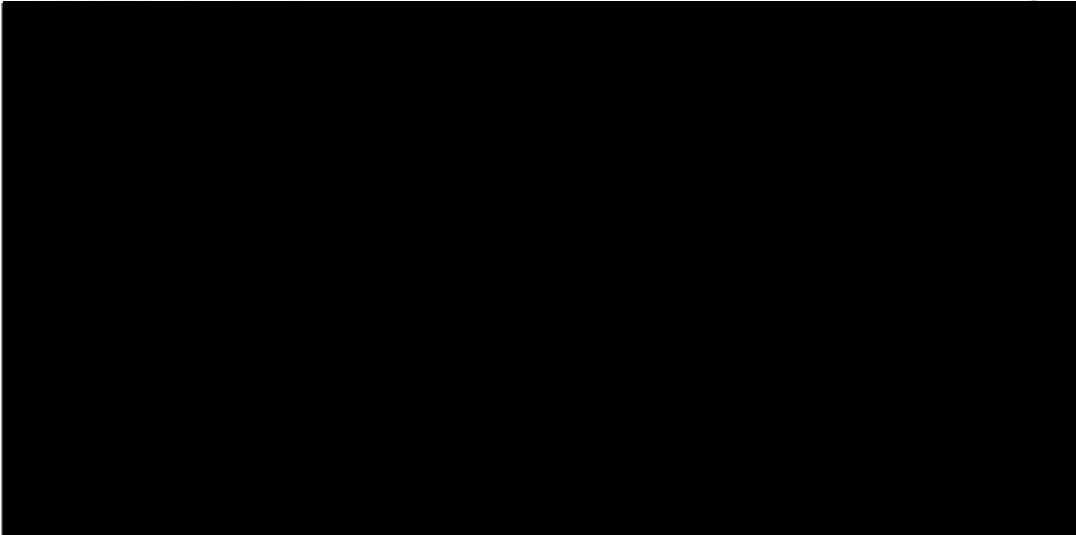


Specifically the objection to site 2HA. I have looked at old aerial photographs and historic GIS layers and still cannot find any evidence of any sports facility on this site. I have spoken with our Grounds Maintenance Manager and they are not aware of any outdoor sports facilities on that site (allocated or not). It would be very helpful if you could give us any further information regarding this site and where you believe the pitch or facility is, so we can address this issue.

Kind regards



Senior Planning Officer (Policy)  
Development Plans  
Development & Growth  
Place Services  
St. Helens Council



Afternoon Victoria,

I'm just emailing you to clarify Sport England's position in regards to the objections received to the St.Helens Borough Local Plan Submission draft, and specifically the objections to allocated sites 2HA and 10HA, as you believe they both include land defined as a playing field.

We are not aware that site 2HA (Land at Florida Farm (south of A580), Slag Lane, Blackbrook) has any type of playing field within it. It is our understanding that the whole site currently comprises of agricultural fields. If you could give us more details on this it would be appreciated.

In regards to site 10HA (Moss Nook Urban Village, Watery Lane, Moss Nook), there is an extant planning application on this site (Ref: P/2003/1574) with agreed and suitable replacement pitches, and associated changing rooms and car-parking, to the north of the site. I

have attached the materplan for your convenience, but more information can be found on the Council website via

<https://publicaccess.sthelens.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZYBFPETA712>

Furthermore, the site proforma for site 10HA (page 247 Appendix 5 of the Local Plan) clearly states that appropriate provision of open space must be included in accordance with Policies LPC05 and LPD03, and that any loss of existing playing fields must include replacement provision of an equal (or improved) quantity and quality.

*(See attached file: P\_2003\_1574-Illustrative\_Masterplan\_A2-726176.pdf)*

With the above in mind, do you still wish to pursue your objection to these 2 sites? I have tried to ring you however, the telephone number we have for you does not appear to be working. We have telephone number [REDACTED]

If you would like to discuss these matters in more detail with me then please do not hesitate to give me a ring. Unfortunately I am out of the office this afternoon but I will be in all day tomorrow and Thursday.

Kind regards

[REDACTED]  
Senior Planning Officer (Policy)  
Development Plans  
Development & Growth  
Place Services  
St. Helens Council

[REDACTED]

RO1789

### Representor Details

Web Reference Number	WF0272
Type of Submission	Web submission
Full Name	Dr Sobhan Vinjamuri
Organisation	
Address	9 Churchill Gardens St Helens WA9 5GB
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	LPA06
Paragraph / diagram / table	3HS
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Positively prepared, Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

- 1) Unsure of legal compliance due to lack of environmental impact on additional residential complexes within a suburban/ semi-urban setting.
- 2) No impact assessment on local amenities including schools, medical services, emergency services, electricity, water, high-speed internet
- 3) No impact assessment on additional traffic burden on small roads
- 4) No acknowledgement of lack of equitable access to local amenities currently. So how can the borough cope with more.
- 5) Areas of beauty are likely to be affected and give way to more urban sprawl

### 7. Please set out modification(s) you consider are necessary

- 1) Full impact study on environmental impact
- 2) Full impact study(ies) on impact on local amenities, addressing current shortfalls and any future shortfalls
- 3) More local engagement with communities likely to be directly affected

### 8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	3/10/2019 10:42:01 AM
---------------	-----------------------

RO1790

Site 8HA

LELO283



Re: St Helens Local plan - Rainford Area  
Melanie Wagstaff  
to:  
planningpolicy  
12/05/2019 16:11

① - GEN

② - LPA05



Mr & Mrs Wagstaff  
187 Higher Lane  
Rainford  
WA11 8NF

We are writing to confirm our objection to the local plan based specifically on the following points:

The standard method for calculating the housing need has been ignored, the economic figures are flawed and there are no exceptional circumstances to justify that green belt should targeted for development.

①  
②

Have all reasonable alternatives been considered, like brown field sites.

Site reference 8HA has been selected, this site constantly floods and is next to an industrial area which recently had a large fire and explosion this could pose a danger to the public living on the site.

②

The green belt is grade one agricultural land which once developed will affect the lively hood of the farmer which is opposite effect to boosting growth.

②

Rainford infrastructure cannot cope as it is, this development will only add to the problems at schools, doctors etc....There is no plans to address these issues.

The roads around Rainford are already to busy, regular accidents take place at the junction between Mill lane/Higher lane and more houses will mean more cars.

Yours Sincerely

Mr & Mrs Wagstaff

RO1791



Site 8HS

EF0033



**Response to local plan .**  
**Iris Wainwright** to: planningpolicy

From: Iris Wainwright [REDACTED]  
To: planningpolicy@sthelens.gov.uk

1 attachment



lpsd-representation-form IW.docx

① - PARA 1.7.2

② - LPA02

12/03/2019 09:04

③ - LPA06

④ - LPA06 - SPECIALIST  
8HS

Hello,

Please find attached my response to the local plan. Please acknowledge receipt.

Regards,

Iris Wainwright.

Sent from my iPad



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Mrs	Title:
First Name: Iris	First name:
Last Name: Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens. Merseyside	Address:
Postcode: WA106EJ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: iris.wainwright15@btinternet.com	Email:

<b>Signature:</b> [REDACTED]	<b>Date:</b> 6 <sup>th</sup> March 2019
------------------------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph / diagram / table	1.7.2	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				table 4, section 2.5 of the Liverpool City Region SuperPort document					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> X

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> X
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> X

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I understand that the council have a legal duty to cooperate. I can find no evidence to indicate that the council has contacted neighbouring boroughs to discuss their plan. If they have then they seem to have ignored the findings, in particular to the development in the wider area and the increased traffic implications. I refer to Liverpool SuperPort quadrupling the number of LO-

LO (load on – load off) TEUs (twenty foot equivalent units) from 750,000 in 2014 to 3,000,000 by 2030 [table 4, section 2.5 of the Liverpool City Region SuperPort document] the majority of which will go by road. In addition to this (taken from the same document) there will be an increase in RO-RO (roll on – roll off) traffic to 1,047,700 units by 2030. Most of this traffic will go by road 22% of this HGV traffic is destined for Merseyside with 35% elsewhere in the North West. This does not mean that the remainder will go by train. Liverpool is unique. Due to its location lorries can do a round trip to the following major locations, Glasgow, Edinburgh, the East coast, London, Bristol and South Wales in a driver's legal hours. In other words goods arriving in Liverpool could leave the port in the morning and be on a shelf in a supermarket in London by late afternoon. Well before a container would have left the port should it go by train.

There is also the development in West Lancashire who are intending to build 6,000 new homes in Bickerstaffe which is just 6 miles from M6 J26 and 6 miles from Windle Island where there is an area of green belt which is planned to become safeguarded for future development. Based on information provided by the Office of National Statistics the development at Bickerstaffe would generate an additional 10,000 vehicles and should the development adjacent to Windle Island (8HS in the local plan) go ahead after 2035 this would generate an additional 1,800 vehicles. This would put additional strain on a road network that is already heavily congested. 8HS is also just 6 miles from J23 of the M6. A junction that is already overloaded at peak times and is predicted to get worse with all the additional LGVs which will be accessing SuperPort and the new warehouses being constructed along the A580 between Liverpool and Haydock.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this

relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Local councils and business should speak to each other. There does not appear to be anyone looking at the bigger picture and the implications that all this development will have on the region and the residents left trying to cope with all the problems it will create. They all seem to be looking after their own interests, SuperPort to make vast profits and the councils who are intent on building as many homes as they can get away with in an attempt to replace government cuts with additional revenue from council tax.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>X</b>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table	4.18.10	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				St. Helens borough local plan 2020-2035 green belt review December 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The "exceptional circumstances" for releasing Green Belt has not been met. Also I cannot find any explanation in the local plan stating why the council think that exceptional circumstances have been met.

It is reassuring to know that the council have a "brownfield first" policy. It states that this will provide 7,817 dwellings which is a considerable amount towards their target. Having read the St. Helens Council "contaminated land inspection strategy" dated January 2017 it states that there are 135.9 square kilometres of contaminated land in the borough. According to table 1 of the document between 2001 and 2015 200 sites per year totalling 3,006 were removed from the inspection list reducing the total from 9,105 sites needing investigating to 6,099 sites remaining. However there does not appear to be a process for moving any sites that have been either decontaminated or were found not to be contaminated onto the brownfield register. It seems inconceivable that none of the remaining sites will become available between now and 2035 and with this amount of sites that could be either low level or not contaminated then the "exceptional circumstances" criteria for releasing green belt surely cannot be met. The total number of Hectares needed to cover safeguarded land is 148. This is tiny (less than 2%) of the remaining total number of hectares of contaminated land.

The following is an extract from the St Helens Council green belt review 2018.

5.11 Overall, the parcels and sub-parcels recommended for allocation in the Local Plan (2020-2035) would provide a combined 2,172 new homes for the Plan period<sup>15</sup>. The safeguarded sites could provide over 2,640 new homes for beyond the Plan period, which when added to new homes on sites included in the Plan as allocations but likely to come forward for construction after 2035, suggests that land for over 5,000 new homes would be available for beyond the Plan period. The allocated and safeguarded sites would therefore be sufficient to meet the housing development needs of the Borough within the Plan period and for a substantial period thereafter.

Based on the above the removing of sites from the green belt and safeguarding them does not meet the exceptional circumstances test. How can it be exceptional when clearly sufficient land exists for the current plan and there is already a supply to cover approximately 2,400 additional dwellings after 2035.

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Leave the Green Belt boundary as it is and look to utilise low level contaminated land. Developers are only too willing to spend millions of pounds on green belt land. Surely it is in the council's interests to work with developers in cleaning up large areas of contaminated land. Councillor Long went onto local television that it would cost £40m to clean up areas of contamination in St. Helens. Whilst this is a significant amount for a council it is a small amount when you consider the amount developers are prepared to pay for Green Belt land. Surely cleaning and developing contaminated land benefits every resident of the town and not just a few developers and land owners.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

## **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

### **3. To which part of the Local Plan does this representation relate?**

Policy	LPA06	Paragraph / diagram / table	4.18.5	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				0		

### **4. Do you consider the St Helens Borough Local Plan 2020-2035 is:**

*Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness*

Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

### **5. If you consider the Local Plan is unsound, is it because it is not:**

*Please read the Guidance note for explanations of the Tests of Soundness*

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

### **6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The local plan submission draft is based on flawed employment forecasts and can't be justified by historical facts.

If you look at job forecasting on the government site a B8 warehouse is using figures from 2015. These no longer reflect the current trend so the anticipated number of jobs will be over exaggerated. Since jobs drive housing then this means the housing need will be affected downwards too.

According to Bericote at the Florida Farm planning meeting their Project director said the development would create between 2,500 and 5,000 new jobs. It will be interesting to see whether this prediction is actually met. Bericote couldn't care less whether it creates 5,000 or 5 but I fully understand why they would say 5,000. All the warehouses seem to have two things in common, the warehouses are getting bigger whilst the staff car park and rest rooms are getting smaller. Even running a three shift system won't account for the current forecasts.

Similarly from documents I have read the Omega park in Warrington originally predicted 24,000 new jobs would be created. Now that Omega is almost complete it would be useful to know

whether this target was met. Personally I doubt it. In fact I bet it doesn't even come close. I read in one of the local newspapers at the time that the new Amazon warehouse at Omega would bring 1,200 jobs. If Amazon, currently a labour intense operation with pickers and packers, (I say currently, search "Amazon picking challenge" to see the advances being made to automate this element as well) only brings 1,200 then my view is that the others will be less. You would need 20 Amazon warehouses to hit target. Even the anticipated office development won't make up the shortfall. This should be a clue for our local plan.

With this in mind it certainly doesn't warrant going outside the standard methodology to increase the housing number it requires a decrease. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet the housing need in St. Helens. The council are using an older forecast (2014) of 486.

if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The housing numbers are being kept artificially high in order to generate revenue from additional council tax. This is not a good basis for identifying future requirements. Future requirements should be based on more realistic data reflecting current trends. The council should use standard methodology taking into account current data from ONS and should take into account the major advances in automation affecting B8 warehouses which is the main strategy of the council in generating new jobs.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at

the oral part of the examination? (the hearings in public)

<b>X</b>	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?

Policy	LPA06	Paragraph / diagram / table	4.24	Policies Map	Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)							

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Do local planning authorities have to meet in full housing needs identified in needs assessments?

(1) Extract from (Department for Communities and Local Government) Press Release "Councils must protect our precious green belt land" 4.10.2014:-

"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs. ✓

However, assessing need is just the first stage in developing a Local Plan. Once [housing] need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period and in so doing take account of any constraints such as green belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need." ✓

i.e. The Green Belt is a constraint that may be a valid reason used by the authority for not meeting its need for housing. ✓

NPPF also states (para 96) that "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities." ✓

8HS, an area of greenbelt identified within the local plan, is vital not only to the health and wellbeing of the local residents but also regarding the ability of the UK to feed itself in the future with regard to the 2 main challenges facing the world in the 21st century of climate change and a growing population. } (3)

"Our global food system... does not meet the basic needs of the world's rising population... demand is growing at the same time as availability of key resources, including water and productive land, decreases" Forum for the Future ✓

We need to find better ways to feed the world

"Hunger, health, a growing population, the need to farm sustainably – these are some of the ✓

issues facing our planet.

In the next 50 years the world must produce more food than in the last 10,000. But we're currently using resources 50% faster than the planet can sustain." (Syngenta).

As Biotechnology and Biological Sciences Research Council (BBSRC) state regarding global food security:-

"Britain is not self-sufficient in food production; it imports 40% of the total food consumed and the proportion is rising .....

From bad to worse

Pressures on the UK's food security are here to stay. Increasing global population and changing consumption patterns are increasing demand for foodstuffs and contributing to upwards price trends. However, the threat to UK food security could be more serious should increased global demand combine with other potential problems." (BBSRC)

If you take 8HS which is an area identified to be removed from a Green Belt and safeguarded. This is not just greenbelt but grade 1 & 2 agricultural land that has been farmed since the 1850s. This puts it up there as some of the best agricultural land in the country.

The U.K. Population continues to grow. There is also not enough houses, in particular affordable houses. Because of this developers are putting pressure on local authorities to release greenbelt and agricultural land so that this can be used to build more houses. This is understandable as it means developers incur less costs per dwelling and can maximise profit. This is excellent for the developer but not so for either the local residents or those looking to purchase an affordable home.

The loss of any greenbelt should not be taken lightly. The land referred to is 8HS and is south of the A580 adjacent to Windle Island and will border Crantock grove and Houghtons Lane to the west is also land that is enjoyed regularly by the residents who use the numerous footpaths. Windle has very little green space and if this land is removed from the Green Belt then the nearest green space in Windle would be over a mile away at the opposite side of Windle. Most of the adjacent land to HS8 is part of Lord Derby's estate and is not open to members of the public.

More worryingly is that the nearest green belt and convenience store would then be to the north of the A580. The recent redesign of the Windle Island junction will include a pedestrian crossing. However at the furthest point from any proposed development on HS8 this would be 1.25 miles from a large number of properties and people would be trying to cross this road nearer to where they live rather than walk to the relative safety of Windle Island. The convenience store is roughly midway between Windle Island and the furthest houses but on the opposite side of the A580. Residents are not going to walk over a mile to get to the crossing and then half a mile to the store and then make the same journey back. Human nature being what it is they will be trying to cross the busy A580 at the nearest point to where they live. This is already a very busy road and as part of the Borough's strategy will get even busier. As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:-

"Following consultation with a transport modeller, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB:( Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more;

Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;

Daily average speed will change by 10km/hr or more; and

Peak hour speed will change by 20km/hr or more."

This does not take into account the future traffic generated by other large developments planned in neighbouring boroughs (6,000 new houses only 6 miles away from HS8 in Bickerstaff) or the quadrupling of SuperPort traffic to 3,000,000 Twenty foot equivalent units by 2030.

There is also a small convenience store at the Eastern end of the development but again this involves having to cross the A570 at the junction with Bleak Hill Rd. Another problem area already subject to heavy congestion and difficult to cross safely.

Any development on this site would also put tremendous strain on the existing amenities, in particular the local schools and surgeries which are already oversubscribed.

Please continue on a separate sheet if necessary

4

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Change 8HS from safeguarded land and maintain its Green Belt status.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>X</b>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--



--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1792

Stn 8HS

EFO034



**Response to local plan .**  
**David Wainwright** to: planningpolicy

From: David Wainwright [REDACTED]  
To: planningpolicy@sthelens.gov.uk

1 attachment



lpsd-representation-form DW.docx

Hello,

Please find attached response to local plan

Many thanks.

Sent from my iPad

① - PARA 1.7.2

② - LPA02

12/03/2019 10:26

③ - LPA06

④ - LPA06 SPECIFICITY  
8HS.



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

<b>1. Your Details</b>	<b>2. Your Agent's Details (if applicable) (we will correspond via your agent)</b>
Title: Mr	Title:
First Name: David	First name:
Last Name: Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens. Merseyside	Address:
Postcode: WA106EJ	Postcode:
Tel No: [REDACTED]	Tel No:
Mobile No: [REDACTED]	Mobile No:
Email: david.wainwright15@btinternet.com	Email:

<b>Signature:</b> [REDACTED]	<b>Date:</b> 6 <sup>th</sup> March 2019
------------------------------	---

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email)

No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Telephone:** 01744 676190

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

**Please use a separate copy of Part B for each separate comment/representation.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph / diagram / table	1.7.2	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				table 4, section 2.5 of the Liverpool City Region SuperPort document						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I understand that the council have a legal duty to cooperate. I can find no evidence to indicate that the council has contacted neighbouring boroughs to discuss their plan. If they have then they seem to have ignored the findings, in particular to the development in the wider area and the increased traffic implications. I refer to Liverpool SuperPort quadrupling the number of LO-

LO (load on – load off) TEUs (twenty foot equivalent units) from 750,000 in 2014 to 3,000,000 by 2030 [table 4, section 2.5 of the Liverpool City Region SuperPort document] the majority of which will go by road. In addition to this (taken from the same document) there will be an increase in RO-RO (roll on – roll off) traffic to 1,047,700 units by 2030. Most of this traffic will go by road 22% of this HGV traffic is destined for Merseyside with 35% elsewhere in the North West. This does not mean that the remainder will go by train. Liverpool is unique. Due to its location lorries can do a round trip to the following major locations, Glasgow, Edinburgh, the East coast, London, Bristol and South Wales in a driver's legal hours. In other words goods arriving in Liverpool could leave the port in the morning and be on a shelf in a supermarket in London by late afternoon. Well before a container would have left the port should it go by train. (1)

There is also the development in West Lancashire who are intending to build 6,000 new homes in Bickerstaffe which is just 6 miles from M6 J26 and 6 miles from Windle Island where there is an area of green belt which is planned to become safeguarded for future development. Based on information provided by the Office of National Statistics the development at Bickerstaffe would generate an additional 10,000 vehicles and should the development adjacent to Windle Island (8HS in the local plan) go ahead after 2035 this would generate an additional 1,800 vehicles. This would put additional strain on a road network that is already heavily congested. 8HS is also just 6 miles from J23 of the M6. A junction that is already overloaded at peak times and is predicted to get worse with all the additional LGVs which will be accessing SuperPort and the new warehouses being constructed along the A580 between Liverpool and Haydock.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this

relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Local councils and business should speak to each other. There does not appear to be anyone looking at the bigger picture and the implications that all this development will have on the region and the residents left trying to cope with all the problems it will create. They all seem to be looking after their own interests, SuperPort to make vast profits and the councils who are intent on building as many homes as they can get away with in an attempt to replace government cuts with additional revenue from council tax.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?							
Policy	LPA02	Paragraph / diagram / table	4.18.10	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment	Habitats Regulation Assessment
Other documents (please name document and relevant part/section)				St. Helens borough local plan 2020-2035 green belt review December 2018			

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The "exceptional circumstances" for releasing Green Belt has not been met. Also I cannot find any explanation in the local plan stating why the council think that exceptional circumstances have been met.

It is reassuring to know that the council have a "brownfield first" policy. It states that this will provide 7,817 dwellings which is a considerable amount towards their target. Having read the St. Helens Council "contaminated land inspection strategy" dated January 2017 it states that there are 135.9 square kilometres of contaminated land in the borough. According to table 1 of the document between 2001 and 2015 200 sites per year totalling 3,006 were removed from the inspection list reducing the total from 9,105 sites needing investigating to 6,099 sites remaining. However there does not appear to be a process for moving any sites that have been either decontaminated or were found not to be contaminated onto the brownfield register. It seems inconceivable that none of the remaining sites will become available between now and 2035 and with this amount of sites that could be either low level or not contaminated then the "exceptional circumstances" criteria for releasing green belt surely cannot be met. The total number of Hectares needed to cover safeguarded land is 148. This is tiny (less than 2%) of the remaining total number of hectares of contaminated land.

The following is an extract from the St Helens Council green belt review 2018.

5.11 Overall, the parcels and sub-parcels recommended for allocation in the Local Plan (2020-2035) would provide a combined 2,172 new homes for the Plan period<sup>15</sup>. The safeguarded sites could provide over 2,640 new homes for beyond the Plan period, which when added to new homes on sites included in the Plan as allocations but likely to come forward for construction after 2035, suggests that land for over 5,000 new homes would be available for beyond the Plan period. The allocated and safeguarded sites would therefore be sufficient to meet the housing development needs of the Borough within the Plan period and for a substantial period thereafter.

Based on the above the removing of sites from the green belt and safeguarding them does not meet the exceptional circumstances test. How can it be exceptional when clearly sufficient land exists for the current plan and there is already a supply to cover approximately 2,400 additional dwellings after 2035.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Leave the Green Belt boundary as it is and look to utilise low level contaminated land. Developers are only too willing to spend millions of pounds on green belt land. Surely it is in the council's interests to work with developers in cleaning up large areas of contaminated land. Councillor Long went onto local television that it would cost £40m to clean up areas of contamination in St. Helens. Whilst this is a significant amount for a council it is a small amount when you consider the amount developers are prepared to pay for Green Belt land. Surely cleaning and developing contaminated land benefits every resident of the town and not just a few developers and land owners.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>X</b>	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy	LPA06	Paragraph / diagram / table	4.18.5	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				0						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The local plan submission draft is based on flawed employment forecasts and can't be justified by historical facts.

If you look at job forecasting on the government site a B8 warehouse is using figures from 2015. These no longer reflect the current trend so the anticipated number of jobs will be over exaggerated. Since jobs drive housing then this means the housing need will be affected downwards too.

According to Bericote at the Florida Farm planning meeting their Project director said the development would create between 2,500 and 5,000 new jobs. It will be interesting to see whether this prediction is actually met. Bericote couldn't care less whether it creates 5,000 or 5 but I fully understand why they would say 5,000. All the warehouses seem to have two things in common, the warehouses are getting bigger whilst the staff car park and rest rooms are getting smaller. Even running a three shift system won't account for the current forecasts.

Similarly from documents I have read the Omega park in Warrington originally predicted 24,000 new jobs would be created. Now that Omega is almost complete it would be useful to know

3

whether this target was met. Personally I doubt it. In fact I bet it doesn't even come close. I read in one of the local newspapers at the time that the new Amazon warehouse at Omega would bring 1,200 jobs. If Amazon, currently a labour intense operation with pickers and packers, (I say currently, search "Amazon picking challenge" to see the advances being made to automate this element as well) only brings 1,200 then my view is that the others will be less. You would need 20 Amazon warehouses to hit target. Even the anticipated office development won't make up the shortfall. This should be a clue for our local plan.

With this in mind it certainly doesn't warrant going outside the standard methodology to increase the housing number it requires a decrease. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet the housing need in St. Helens. The council are using an older forecast (2014) of 486.

if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The housing numbers are being kept artificially high in order to generate revenue from additional council tax. This is not a good basis for identifying future requirements. Future requirements should be based on more realistic data reflecting current trends. The council should use standard methodology taking into account current data from ONS and should take into account the major advances in automation affecting B8 warehouses which is the main strategy of the council in generating new jobs.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at

the oral part of the examination? (the hearings in public)			
<b>X</b>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

**PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	4.24	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:

Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness

Legally Compliant?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is unsound, is it because it is not:

Please read the Guidance note for explanations of the Tests of Soundness

Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Do local planning authorities have to meet in full housing needs identified in needs assessments?

(1) Extract from (Department for Communities and Local Government) Press Release "Councils must protect our precious green belt land" 4.10.2014:-

"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once [housing] need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period and in so doing take account of any constraints such as green belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

i.e. The Green Belt is a constraint that may be a valid reason used by the authority for not meeting its need for housing.

NPPF also states (para 96) that "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities."

8HS, an area of greenbelt identified within the local plan, is vital not only to the health and wellbeing of the local residents but also regarding the ability of the UK to feed itself in the future with regard to the 2 main challenges facing the world in the 21st century of climate change and a growing population.

"Our global food system... does not meet the basic needs of the world's rising population... demand is growing at the same time as availability of key resources, including water and productive land, decreases" Forum for the Future

We need to find better ways to feed the world

"Hunger, health, a growing population, the need to farm sustainably – these are some of the



issues facing our planet.

In the next 50 years the world must produce more food than in the last 10,000. But we're currently using resources 50% faster than the planet can sustain." (Syngenta).

As Biotechnology and Biological Sciences Research Council (BBSRC) state regarding global food security:-

"Britain is not self-sufficient in food production; it imports 40% of the total food consumed and the proportion is rising .....

From bad to worse

Pressures on the UK's food security are here to stay. Increasing global population and changing consumption patterns are increasing demand for foodstuffs and contributing to upwards price trends. However, the threat to UK food security could be more serious should increased global demand combine with other potential problems." (BBSRC)

If you take 8HS which is an area identified to be removed from a Green Belt and safeguarded. This is not just greenbelt but grade 1 & 2 agricultural land that has been farmed since the 1850s. This puts it up there as some of the best agricultural land in the country.

The U.K. Population continues to grow. There is also not enough houses, in particular affordable houses. Because of this developers are putting pressure on local authorities to release greenbelt and agricultural land so that this can be used to build more houses. This is understandable as it means developers incur less costs per dwelling and can maximise profit. This is excellent for the developer but not so for either the local residents or those looking to purchase an affordable home.

The loss of any greenbelt should not be taken lightly. The land referred to is 8HS and is south of the A580 adjacent to Windle Island and will border Crantock grove and Houghtons Lane to the west is also land that is enjoyed regularly by the residents who use the numerous footpaths. Windle has very little green space and if this land is removed from the Green Belt then the nearest green space in Windle would be over a mile away at the opposite side of Windle. Most of the adjacent land to HS8 is part of Lord Derby's estate and is not open to members of the public.

More worryingly is that the nearest green belt and convenience store would then be to the north of the A580. The recent redesign of the Windle Island junction will include a pedestrian crossing. However at the furthest point from any proposed development on HS8 this would be 1.25 miles from a large number of properties and people would be trying to cross this road nearer to where they live rather than walk to the relative safety of Windle Island. The convenience store is roughly midway between Windle Island and the furthest houses but on the opposite side of the A580. Residents are not going to walk over a mile to get to the crossing and then half a mile to the store and then make the same journey back. Human nature being what it is they will be trying to cross the busy A580 at the nearest point to where they live. This is already a very busy road and as part of the Borough's strategy will get even busier. As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:-

"Following consultation with a transport modeller, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB:( Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more;

Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;

Daily average speed will change by 10km/hr or more; and

Peak hour speed will change by 20km/hr or more."

This does not take into account the future traffic generated by other large developments planned in neighbouring boroughs (6,000 new houses only 6 miles away from HS8 in Bickerstaff) or the quadrupling of SuperPort traffic to 3,000,000 Twenty foot equivalent units by 2030.

There is also a small convenience store at the Eastern end of the development but again this involves having to cross the A570 at the junction with Bleak Hill Rd. Another problem area already subject to heavy congestion and difficult to cross safely.

Any development on this site would also put tremendous strain on the existing amenities, in particular the local schools and surgeries which are already oversubscribed.

4

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Change 8HS from safeguarded land and maintain its Green Belt status.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1793

Sinc 8HS

EFOO50



response to local plan  
Debbie Wainwright  
to:  
planningpolicy  
12/03/2019 21:06



① - Para 1.7.2

② - LPA02

③ - LPA06

④ LPA06 - SPECIFICALLY  
8HS

1 Attachment



Lppsd-representation formDLW.doc

Please find attached my response to the local plan.

regards,

Debbie Wainwright



St. Helens  
Council

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. **Any comments received after this deadline cannot be accepted.**

This form has two parts;

**Part A** – Personal Details

**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: Miss	Title:
First Name: Deborah, Louise	First name:
Last Name Wainwright	Last Name:
Organisation/company:	Organisation/company:
Address: 38, Crantock Grove, Windle, St. Helens, Merseyside	Address:
Postcode: WA106EJ	Postcode:
[Redacted]	Tel No:
[Redacted]	Mobile No:
[Redacted]	Email:

Signature: [Redacted]	Date: 12 <sup>th</sup> March 2019
-----------------------	-----------------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

<b>Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?</b> (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)	
Yes X <input type="checkbox"/> (Via Email)	No <input type="checkbox"/>

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

### **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13<sup>th</sup> March 2019** by:

post to: **Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St.Helens  
Merseyside  
WA10 1HP**

**or** by hand delivery to: Ground Floor Reception, St.Helens Town Hall (open Monday-Friday 8:30am – 5:15pm)

**or** by e-mail to: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

*Please note we are unable to accept faxed copies of this form.*

### **FURTHER INFORMATION**

If you require further information please see the FAQs on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan). If you still need assistance, you can contact us via:

**Email:** [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)  
**Telephone:** 01744 676190

### **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

### **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form, setting out your representation/comment.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy		Paragraph / diagram / table		Policies Map	1.7.2	Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)				table 4, section 2.5 of the Liverpool City Region SuperPort document						

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No x <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/> x
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/> x

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

I understand that the council have a legal duty to cooperate. I can find no evidence to indicate that the council has contacted neighbouring boroughs to discuss their plan. If they have then they seem to have ignored the findings, in particular to the development in the wider area and the increased traffic implications. I refer to Liverpool SuperPort quadrupling the number of LO-LO (load on – load off) TEUs (twenty foot equivalent units) from 750,000 in 2014 to 3,000,000 by 2030 [table 4, section 2.5 of the Liverpool City Region SuperPort document] the majority of which will go by road. In addition to this (taken from the same document) there will be an



increase in RO-RO (roll on – roll off) traffic to 1,047,700 units by 2030. Most of this traffic will go by road 22% of this HGV traffic is destined for Merseyside with 35% elsewhere in the North West. This does not mean that the remainder will go by train. Liverpool is unique. Due to its location lorries can do a round trip to the following major locations, Glasgow, Edinburgh, the East coast, London, Bristol and South Wales in a driver's legal hours. In other words goods arriving in Liverpool could leave the port in the morning and be on a shelf in a supermarket in London by late afternoon. Well before a container would have left the port should it go by train.

There is also the development in West Lancashire who are intending to build 6,000 new homes in Bickerstaffe which is just 6 miles from M6 J26 and 6 miles from Windle Island where there is an area of green belt which is planned to become safeguarded for future development. Based on information provided by the Office of National Statistics the development at Bickerstaffe would generate an additional 10,000 vehicles and should the development adjacent to Windle Island (8HS in the local plan) go ahead after 2035 this would generate an additional 1,800 vehicles. This would put additional strain on a road network that is already heavily congested. 8HS is also just 6 miles from J23 of the M6. A junction that is already overloaded at peak times and is predicted to get worse with all the additional LGVs which will be accessing SuperPort and the new warehouses being constructed along the A580 between Liverpool and Haydock.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Local councils and business should speak to each other. There does not appear to be anyone looking at the bigger picture and the implications that all this development will have on the region and the residents left trying to cope with all the problems it will create. They all seem to be looking after their own interests, SuperPort to make vast profits and the councils who are intent on building as many homes as they can get away with in an attempt to replace government cuts with additional revenue from council tax.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>X</b>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA02	Paragraph / diagram / table	4.18.10	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)				St. Helens borough local plan 2020-2035 green belt review December 2018					

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No x <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	x <input type="checkbox"/>
Effective?	x <input type="checkbox"/>
Consistent with National Policy?	x <input type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

The "exceptional circumstances" for releasing Green Belt has not been met. Also I cannot find any explanation in the local plan stating why the council think that exceptional circumstances have been met.

It is reassuring to know that the council have a "brownfield first" policy. It states that this will

②

provide 7,817 dwellings which is a considerable amount towards their target. Having read the St. Helens Council "contaminated land inspection strategy" dated January 2017 it states that there are 135.9 square kilometres of contaminated land in the borough. According to table 1 of the document between 2001 and 2015 200 sites per year totalling 3,006 were removed from the inspection list reducing the total from 9,105 sites needing investigating to 6,099 sites remaining. However there does not appear to be a process for moving any sites that have been either decontaminated or were found not to be contaminated onto the brownfield register. It seems inconceivable that none of the remaining sites will become available between now and 2035 and with this amount of sites that could be either low level or not contaminated then the "exceptional circumstances" criteria for releasing green belt surely cannot be met. The total number of Hectares needed to cover safeguarded land is 148. This is tiny (less than 2%) of the remaining total number of hectares of contaminated land.

The following is an extract from the St Helens Council green belt review 2018.

5.11 Overall, the parcels and sub-parcels recommended for allocation in the Local Plan (2020-2035) would provide a combined 2,172 new homes for the Plan period. The safeguarded sites could provide over 2,640 new homes for beyond the Plan period, which when added to new homes on sites included in the Plan as allocations but likely to come forward for construction after 2035, suggests that land for over 5,000 new homes would be available for beyond the Plan period. The allocated and safeguarded sites would therefore be sufficient to meet the housing development needs of the Borough within the Plan period and for a substantial period thereafter.

Based on the above the removing of sites from the green belt and safeguarding them does not meet the exceptional circumstances test. How can it be exceptional when clearly sufficient land exists for the current plan and there is already a supply to cover approximately 2,400 additional dwellings after 2035.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Leave the Green Belt boundary as it is and look to utilise low level contaminated land. Developers are only too willing to spend millions of pounds on green belt land. Surely it is in the council's interests to work with developers in cleaning up large areas of contaminated land. Councillor Long went onto local television that it would cost £40m to clean up areas of contamination in St. Helens. Whilst this is a significant amount for a council it is a small amount when you consider the amount developers are prepared to pay for Green Belt land. Surely cleaning and developing contaminated land benefits every resident of the town and not just a few developers and land owners.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

*modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	<b>No</b> , I do not wish to participate at the oral examination	<input type="checkbox"/>	<b>Yes</b> , I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	4.18.5	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate</u> . Please be as precise as possible.
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments
The local plan submission draft is based on flawed employment forecasts and can't be justified by historical facts.
If you look at job forecasting on the government site a B8 warehouse is using figures from 2015. These no longer reflect the current trend so the anticipated number of jobs will be over exaggerated. Since jobs drive housing then this means the housing need will be affected downwards too.
According to Bericote at the Florida Farm planning meeting their Project director said the

3

development would create between 2,500 and 5,000 new jobs. It will be interesting to see whether this prediction is actually met. Bericote couldn't care less whether it creates 5,000 or 5 but I fully understand why they would say 5,000. All the warehouses seem to have two things in common, the warehouses are getting bigger whilst the staff car park and rest rooms are getting smaller. Even running a three shift system won't account for the current forecasts.

Similarly from documents I have read the Omega park in Warrington originally predicted 24,000 new jobs would be created. Now that Omega is almost complete it would be useful to know whether this target was met. Personally I doubt it. In fact I bet it doesn't even come close. I read in one of the local newspapers at the time that the new Amazon warehouse at Omega would bring 1,200 jobs. If Amazon, currently a labour intense operation with pickers and packers, (I say currently, search "Amazon picking challenge" to see the advances being made to automate this element as well) only brings 1,200 then my view is that the others will be less. You would need 20 Amazon warehouses to hit target. Even the anticipated office development won't make up the shortfall. This should be a clue for our local plan.

With this in mind it certainly doesn't warrant going outside the standard methodology to increase the housing number it requires a decrease. The latest estimate by the ONS (2016) predicts that 383 houses per year will be required to meet the housing need in St. Helens. The council are using an older forecast (2014) of 486.

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The housing numbers are being kept artificially high in order to generate revenue from additional council tax. This is not a good basis for identifying future requirements. Future requirements should be based on more realistic data reflecting current trends. The council should use standard methodology taking into account current data from ONS and should take into account the major advances in automation affecting B8 warehouses which is the main strategy of the council in generating new jobs.

Please continue on a separate sheet if necessary

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.**

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

x	No, I do not wish to participate at the oral examination	Yes, I wish to participate at the oral examination
---	--	--

--	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination*

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



## Please use a separate copy of Part B for each separate comment/representation.

### **PART B – YOUR REPRESENTATION**

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy	LPA06	Paragraph / diagram / table	4.24	Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment	
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>			
Legally Compliant?	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes	<input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

**6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.**

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

Do local planning authorities have to meet in full housing needs identified in needs assessments?

(1) Extract from (Department for Communities and Local Government) Press Release "Councils must protect our precious green belt land" 4.10.2014:-

"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once [housing]

need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period and in so doing take account of any constraints such as green belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

i.e. The Green Belt is a constraint that may be a valid reason used by the authority for not meeting its need for housing.

NPPF also states (para 96) that "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities."

8HS, an area of greenbelt identified within the local plan, is vital not only to the health and wellbeing of the local residents but also regarding the ability of the UK to feed itself in the future with regard to the 2 main challenges facing the world in the 21st century of climate change and a growing population.

"Our global food system... does not meet the basic needs of the world's rising population... demand is growing at the same time as availability of key resources, including water and productive land, decreases" Forum for the Future

We need to find better ways to feed the world

"Hunger, health, a growing population, the need to farm sustainably – these are some of the issues facing our planet.

In the next 50 years the world must produce more food than in the last 10,000. But we're currently using resources 50% faster than the planet can sustain." (Syngenta).

As Biotechnology and Biological Sciences Research Council (BBSRC) state regarding global food security:-

"Britain is not self-sufficient in food production; it imports 40% of the total food consumed and the proportion is rising .....

From bad to worse

Pressures on the UK's food security are here to stay. Increasing global population and changing consumption patterns are increasing demand for foodstuffs and contributing to upwards price trends. However, the threat to UK food security could be more serious should increased global demand combine with other potential problems." (BBSRC)

If you take 8HS which is an area identified to be removed from a Green Belt and safeguarded. This is not just greenbelt but grade 1 & 2 agricultural land that has been farmed since the 1850s. This puts it up there as some of the best agricultural land in the country.

The U.K. Population continues to grow. There is also not enough houses, in particular affordable houses. Because of this developers are putting pressure on local authorities to release greenbelt and agricultural land so that this can be used to build more houses. This is understandable as it means developers incur less costs per dwelling and can maximise profit. This is excellent for the developer but not so for either the local residents or those looking to purchase an affordable home.

The loss of any greenbelt should not be taken lightly. The land referred to is 8HS and is south of the A580 adjacent to Windle Island and will border Crantock grove and Houghtons Lane to the west is also land that is enjoyed regularly by the residents who use the numerous footpaths.

Windle has very little green space and if this land is removed from the Green Belt then the nearest green space in Windle would be over a mile away at the opposite side of Windle. Most of the adjacent land to HS8 is part of Lord Derby's estate and is not open to members of the public.

More worryingly is that the nearest green belt and convenience store would then be to the north of the A580. The recent redesign of the Windle Island junction will include a pedestrian crossing. However at the furthest point from any proposed development on HS8 this would be 1.25 miles from a large number of properties and people would be trying to cross this road nearer to where they live rather than walk to the relative safety of Windle Island. The convenience store is roughly midway between Windle Island and the furthest houses but on the opposite side of the A580. Residents are not going to walk over a mile to get to the crossing and then half a mile to the store and then make the same journey back. Human nature being what it is they will be trying to cross the busy A580 at the nearest point to where they live. This is already a very busy road and as part of the Borough's strategy will get even busier. As the figures taken from the Mott MacDonald business case for the Windle Island Improvement plan show:-

"Following consultation with a transport modeller, junction improvements at the Windle Island junction are not predicted to trigger the criteria which relate to traffic flow or speeds changes in DMRB: (Design Manual for Roads and Bridges). Daily Traffic flows will change by 1000 AADT (Average Annual Daily Traffic) or more;

Heavy Duty Vehicle (HDV) flows will change by 200 AADT or more;

Daily average speed will change by 10km/hr or more; and

Peak hour speed will change by 20km/hr or more."

This does not take into account the future traffic generated by other large developments planned in neighbouring boroughs (6,000 new houses only 6 miles away from HS8 in Bickerstaff) or the quadrupling of SuperPort traffic to 3,000,000 Twenty foot equivalent units by 2030.

There is also a small convenience store at the Eastern end of the development but again this involves having to cross the A570 at the junction with Bleak Hill Rd. Another problem area already subject to heavy congestion and difficult to cross safely.

Any development on this site would also put tremendous strain on the existing amenities, in particular the local schools and surgeries which are already oversubscribed.

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Change 8HS from safeguarded land and maintain its Green Belt status.

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested

*modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.*

***After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.***

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<b>x</b>	<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination
----------	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination***

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**

RO1794



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>DELOK</u>	First name: .....
Last Name: <u>WAINWRIGHT</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>16 GORDON AVE</u> <u>ASTON IN MARKETFIELD</u> <u>WISAN</u>	Address: .....
Postcode: <u>WN4 0QA</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED]	Date: <u>20/02/2019</u>
-----------------------	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>CLAdg</i>	<i>Site</i> <i>IHS</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.
<p><i>NOT JUSTIFIED AS IMPROVED POPULATION ESTIMATES DECLINING POPULATION SINCE 1981. WHERE ARE POPULATION COMING FROM GREENBELT ASSISTS URBAN REGENERATION BY ENCOURAGING RECYCLING OF DEFECT / URBAN LAND RELEASE OF GREENBELT CAUSES HARM TO PURPOSE OF GREENBELT LACK OF LOCAL FACILITIES AND AMENITIES LEADS HOUSEHOLD UNSUSTAINABLE USE OF CARS WOULD BE ENCOURAGED AS A RESULT</i></p>

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED  
REMOVAL OF GREEN BELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPS  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>HR</u>	Title: .....
First Name: <u>DEEK</u>	First name: .....
Last Name: <u>WAINWRIGHT</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>16 GORDON AVENUE</u> <u>ASTON-IN-MARKETFIELD</u> <u>WIGAN</u>	Address: .....
Postcode: <u>WN4 0QA</u>	Postcode: .....
Tel No: .....	Tel No: .....
Mobile No: 	Mobile No: .....
Email: .....	Email: .....

Signature: 	Date: <u>20/02/2019</u>
--	-------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## **RETURN DETAILS**

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## **FURTHER INFORMATION**

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## **NEXT STEPS**

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## **DATA PROTECTION**

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?									
Policy		Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment	
LPA 05 SITE 2 HA									
Other documents (please name document and relevant part/section)									

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>POPULATION ESTIMATES NOT PROVEN            ONGOING DECLINE IN POPULATION SINCE 1981            USING GREENBELT DOES NOT ENCOURAGE REGENERATION            OF BROWNFIELD URBAN SITES            SIGNIFICANT HARM TO GREENBELT IF GREENFIELD            UTILISED            HOUSING IN THIS AREA IS NOT SUSTAINABLE DUE TO LACK            OF SCHOOL PLACES, DOCTORS SURGERIES, BUS ROUTES            PLAN WOULD ENCOURAGE CAR USE AS RESULT            HIGHWAY ALREADY OVERLOADED, EXTRA TRAFFIC            WOULD MAKE THINGS WORSE</p>

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM REMOVAL FROM GREENBELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



St. Helens  
Council

252

**St Helens Borough Local Plan 2020-2035 (Submission Draft)  
Representation (i.e. Comment) Form**

Ref: LPSD

01 MAR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan).

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot be accepted**.

This form has two parts;  
**Part A** – Personal Details  
**Part B** – Your Representation(s).

**PART A – YOUR DETAILS**

Please note that you must complete Parts A and B of this form.

1. Your Details	2. Your Agent's Details (if applicable) (we will correspond via your agent)
Title: MR	Title:
First Name: DEEK	First name:
Last Name: WAINWRIGHT	Last Name:
Organisation/company:	Organisation/company:
Address: 16 GORDON AVE ASTON IN MAKELFIELD	Address:
Postcode: WIGAN	Postcode:
Tel No:	Tel No:
Mobile:	
Email:	

Signature: [Redacted] Date: 20/02/2019

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes  (Via Email) No

Please note - e-mail is the Council's preferred method of communication. If no e-mail address is provided, we will contact you by your postal address.

## PART B – YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LAOS	SITE IHA	Paragraph / diagram / table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulation Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is: <i>Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness</i>		
Legally Compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Complies with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not: <i>Please read the Guidance note for explanations of the Tests of Soundness</i>	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments

NOT JUSTIFIED - LACK OF PROOF OF POPULATION ESTIMATES POPULATION IN DECLINE SINCE 1981  
 USE OF GREENBELT FAILS TO ENCOURGE BROWNFIELD / URBAN REGENERATION  
 RELEASE OF GREENBELT WILL CAUSE HARM TO PURPOSE OF GREENBELT  
 HOUSINGS UNSUSTAINABLE DUE TO LACK OF FACILITIES AND AMENITIES  
 NO STATEMENT OF COMMONSOUND WITH NEIGHBOUR AUTH. CAR USE WILL INCREASE BECAUSE OF LACK OF FACILITIES  
 ACCESS TO SITE FROM BILLINGSE RD OR CARSWOOD RD INADEQUATE  
 HIGHWAY WORKS SHOULD BE FOUNDED BY DEVELOPER

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE LANDS FROM PROPOSED  
REMOVAL FROM GREEN BELT

Please continue on a separate sheet if necessary

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

No	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
----	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.  
Please keep a copy for future reference.**



RO1795



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD

01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

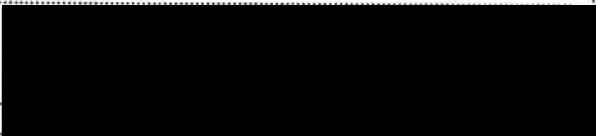
This form has two parts;

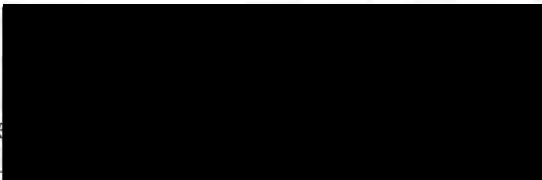
**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>Mrs</u>	Title: _____
First Name: <u>SARAH-LOUISE</u>	First name: _____
Last Name: <u>WAINWRIGHT</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>16 GOLDSOM AVE</u> <u>BUTTON IN MAKEFIELD</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0QA</u>	Postcode: _____
Tel No: _____	Tel No: _____
Mobile: 	Mobile No: _____
Email: _____	Email: _____

Signature: 	Date: <u>27/2/2019</u>
--	------------------------

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**

(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)

No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy <i>LPA 06</i>	<i>SITE</i> <i>IHS</i>	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to <u>set out</u> your comments.</p>

NOT JUSTIFIED - COUNCIL SHOULD PROVIDE POPULATION ESTIMATES, ST HELENS POPULATION IN DECLINE SINCE 1981. WHERE ARE EXTRA PEOPLE COMING FROM  
 A PURPOSE OF GREENBELT IS TO ASSIST URBAN REGENERATION BY RECYCLING URBAN OR DERELICT LAND - USING GREENBELT FARMS TO ENCOURAGE THIS  
 RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO PURPOSE OF GREENBELT  
 HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF LACK OF SCHOOL PLACES, DOCTOR'S SURGERIES, BUS ROUTES AND OTHER SERVICES. USE OF CARS IS BEING ENCOURAGED BY LACK OF FACILITIES  
 SITE ACCESS WOULD BE INADEQUATE  
 NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES

Please continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THIS LAND FROM PROPOSED  
REMOVAL OF GREENBELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

<input checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes, I wish to participate at the oral examination
-------------------------------------	--	--------------------------	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

268

Ref: LPSD  
01 MAR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Wednesday 13th March 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MKS</u>	Title: _____
First Name: <u>Sarah-Louise</u>	First name: _____
Last Name: <u>MANUELLOTTI</u>	Last Name: _____
Organisation/company: _____	Organisation/company: _____
Address: <u>16 GORON AVE</u> <u>ASTON IN MARKETON</u> <u>WIGAN</u>	Address: _____
Postcode: <u>WN4 0QA</u>	Postcode: _____
Tel No: _____	_____
Mobile: _____	No: _____
Email: _____	_____
Signature: _____	Date: <u>21/2/2019</u>

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you MUST include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

<sup>1</sup> view at <http://www.legislation.gov.uk/ukpga/2004/5/contents>

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Wednesday 13th March 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

## PART B - YOUR REPRESENTATION

Please use a separate form Part B for each representation, and supply together with Part A so we know who has made the comment. Please also read the Guidance Note that accompanies this form before you complete it.

3. To which part of the Local Plan does this representation relate?										
Policy LPA05	SITE IHA	Paragraph/ diagram table		Policies Map		Sustainability Appraisal/ Strategic Environmental Assessment		Habitats Regulations Assessment		
Other documents (please name document and relevant part/section)										

4. Do you consider the St Helens Borough Local Plan 2020-2035 is:		
Please read the Guidance note for explanations of Legal Compliance and the Tests of Soundness		
Legally Compliant?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Sound?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Complies with the Duty to Cooperate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Please tick as appropriate

5. If you consider the Local Plan is <u>unsound</u> , is it because it is not:	
Please read the Guidance note for explanations of the Tests of Soundness	
Positively Prepared?	<input checked="" type="checkbox"/>
Justified?	<input checked="" type="checkbox"/>
Effective?	<input checked="" type="checkbox"/>
Consistent with National Policy?	<input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan is <u>not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.</u>
<p>If you wish to <u>support</u> the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>NOT JUSTIFIED - COUNCIL SHOULD HAVE POPULATION ESTIMATES STHELENS POPULATION IN DECLINE SINCE 1981 A PURPOSE OF GREENBELT IS TO ASSIST URBAN REGROWTH, USING GREENBELT FAILS TO ENCOURAGE THIS RELEASE OF GREENBELT WILL CAUSE SIGNIFICANT HARM TO PURPOSE OF GREENBELT HOUSING IN THIS AREA ISN'T SUSTAINABLE BECAUSE OF LACK OF BASIC AMENITIES AND SERVICES, EDUCATION, MEDICAL, TRANS- PORT SITE ACCESS WOULD BE INADEQUATE NO STATEMENT OF COMMON GROUND WITH NEIGHBOURING AUTHORITIES</p>

Please continue on a separate sheet if necessary



7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6. above where this relates to soundness (NB please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

DELETE THE LAND FROM THE PROPOSED  
REMOVAL OF GREEN BELT

Please continue on a separate sheet if necessary

**Please note:** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at the publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification; do you consider it necessary to participate at the oral part of the examination? (the hearings in public)

/	No, I do not wish to participate at the oral examination		Yes, I wish to participate at the oral examination
---	--	--	--

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination

**Thank you for taking the time to complete and return this response form.**

**Please keep a copy for future reference.**

RO1796

### Representor Details

Web Reference Number	WF0438
Type of Submission	Web submission
Full Name	Mr David Wainwright
Organisation	
Address	54 Windlebrook Crescent Windle St. Helen's Merseyside WA106DY
Agent Details	

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035? (namely, submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)**

Yes (via e-mail)

### 3. To which part of the Local Plan does this representation relate?

Policy	
Paragraph / diagram / table	
Policies Map	
Sustainability Appraisal / Strategic Environmental Assessment	This
Habitats Regulation Assessment	
Other documents	

### 4. Do you consider the St Helens Borough Local Plan 2020-2035:

Is legally compliant?	No
Is sound?	No
Complies with the duty to cooperate?	No

### 5. If you consider the Local Plan is unsound, it because it is not:

Justified, Effective, Consistent with national policy

### 6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as concise as possible.

I see no reason or justification for building on Green Belt land. Where is the demand for these homes seems to me we have empty houses all over the borough both new and old.

How can it be effective when Windle has no doctor no dentist and schools that are already full to capacity. The A580 is already busy and is going to get worse without additional traffic from new homes. Windle island is a total mess even with the ongoing improvements it will only get worse. Bleak Hill Road, Calderhurst Drive, are dreadful at school times, what will they be like with the massive increase of children and traffic.

National Policy must see an increase in food growth for an increase in population. Building these new homes on Agricultural land is not a long term solution, it's a short term disaster.

### 7. Please set out modification(s) you consider are necessary

Simply scrap the development and concentrate on brown fill sites. Also let's look at the number of houses standing empty and get them up to living standard for all different age groups and earnings.

**8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?**

No, I do not wish to participate at the oral examination

**9. If you wish to participate in the oral part of the examination, please outline why you consider this to be necessary:**

Response Date	2/26/2019 10:16:29 PM
---------------	-----------------------

RO1797



St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
30 APR 2019

(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**. Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

900

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MR</u>	Title: .....
First Name: <u>KARL</u>	First name: .....
Last Name: <u>WALTON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>63 BARRYS LANE</u>	Address: .....
<u>ST. HELENS</u>	.....
<u>MARSEYSIDE</u>	.....
Postcode: <u>WA9 2AT</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED] Date: 21/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?** (namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:

post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

[planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1798





St. Helens Council

# St Helens Borough Local Plan 2020-2035 (Submission Draft) Representation (i.e. Comment) Form

Ref: LPSD  
30 APR 2019  
(For official use only)

Please also read the **Representation Form Guidance Note** that is available with this form, or online at: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Please ensure the form is returned to us **by no later than 5pm on Monday 13th May 2019**  
Any comments received after this deadline **cannot** be accepted.

This form has two parts;

**Part A - Personal Details**

**Part B - Your Representation(s)**

## PART A - YOUR DETAILS

901

Please note that you must complete Parts A and B of this form.

1. Your Details (we will correspond via your agent)	2. Your Agent's Details (if applicable)
Title: <u>MRS</u>	Title: .....
First Name: <u>SANDRA</u>	First name: .....
Last Name: <u>WALDRON</u>	Last Name: .....
Organisation/company: .....	Organisation/company: .....
Address: <u>63 BERRY'S LANE</u> <u>ST. HELENS</u>	Address: .....
Postcode: <u>WA9 3QT</u>	Postcode: .....
Tel No: [REDACTED]	Tel No: .....
Mobile No: [REDACTED]	Mobile No: .....
Email: [REDACTED]	Email: .....

Signature: [REDACTED] Date: 21/4/19

Please be aware that anonymous forms cannot be accepted and that in order for your comments to be considered you **MUST** include your details above.

**Would you like to be kept updated of future stages of the St Helens Borough Local Plan 2020-2035?**  
(namely submission of the Plan for examination, publication of the Inspector's recommendations and adoption of the Plan)

Yes (via email)  No

**Please note** - email is the Council's preferred method of communication. If no email address is provided, we will contact you by your postal address.

## RETURN DETAILS

Please return your completed form to us **by no later than 5pm on Monday 13th May 2019** by:  
post to:

**Local Plan  
St.Helens Council  
Town Hall  
Victoria Square  
St Helens  
WA10 1HP**

or by hand delivery to:

Ground Floor Reception  
St.Helens Town Hall  
(open Monday-Friday 8.30am - 5.15pm)

or by email to:

planningpolicy@sthelens.gov.uk

**Please note we are unable to accept faxed copies of this form.**

## FURTHER INFORMATION

If you require further information please see the FAQs on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

If you still need assistance, you can contact us via:

Email: [planningpolicy@sthelens.gov.uk](mailto:planningpolicy@sthelens.gov.uk)

Telephone: **01744 676190**

## NEXT STEPS

The Council intends to submit the St.Helens Borough Local Plan 2020-2035 Submission Draft to the Government's Planning Inspectorate for Examination. All representations made will be forwarded to the Planning Inspectorate for consideration during the Examination.

## DATA PROTECTION

We process personal data as part of our public task to prepare a Local Plan, and will retain this in line with our Information and Records Management Policy. For more information on what we do and on your rights please see the data protection information on our website: [www.sthelens.gov.uk/localplan](http://www.sthelens.gov.uk/localplan)

Many thanks for taking the time to fill out this form; your co-operation is gratefully received.

**Now please complete PART B of this form,  
setting out your representation/comment.**

**Please use a separate copy of Part B  
for each separate comment/representation.**

RO1799



REPRESENTATION - ST HELENS BOROUGH LOCAL PLAN 2020-2035

Gill Walker

to:

planningpolicy

12/03/2019 18:29

Hide Details

From: Gill Walker [REDACTED]

To: planningpolicy@sthelens.gov.uk

Site : HA8 Rookery Lane, Rainford, St Helens ①

E10122

8HA

- ① LPA05
- ② S.A
- ③ LPA02

① I am writing to express grave concern over the potential development of a large piece of actively farmed Grade A agricultural land on Rookery Lane, Rainford, that is currently earmarked for destruction by St Helens Council – to be replaced (as I understand it) with up to 259 new homes.

In accordance with the Government’s National Planning Policy Framework, I would like to request that you consider very closely this project in order to assess the **EXCEPTIONAL CIRCUMSTANCES** that St Helens Council feel may justify the annihilation of Rainford’s Greenbelt - because once this fertile land has gone – it has gone forever. Any destruction of Greenbelt land – particularly Grade A agricultural land - should surely only be developed as a **very last resort**, when all other possibilities to develop alternative sites, i.e. brownfield sites, under-utilised land, previously-developed land, empty properties, etc. have all been fully exploited, and when St Helens Council can substantiate this together with the viability of their economic analysis relating to this entire project. ② ③

I look forward to receiving confirmation that this email has been received and my comments duly noted and hopefully acted upon.

Many thanks.

Yours faithfully

Gillian Walker  
 Pennsylvania Farm  
 Holiday Moss  
 Rainford  
 St Helens WA11 8NP  
 Tel : [REDACTED]  
 [REDACTED]

RO1800

620242



REPRESENTATION : St.Helens Borough Local Plan 2020-2035: Submission Draft  
Town and Country Planning (Local Planning) (England) Regulations 2012

John Walker

to:

planningpolicy

13/03/2019 16:35

Hide Details



SITE 8HA  
① - LPA05  
② - S.A.

Dear Sir/Madam

**Re : Site 8HA, Rookery Lane/Higher Lane, Rainford St Helens**

Further to your email dated 18th January 2019, I am writing to formally submit my representation in respect of the proposed plans to remove Greenbelt from the above site.

I am still extremely concerned and very unhappy that this site is Grade A agricultural land that is currently farmed and provides employment in the agricultural sector.

In the light of Brexit our own food production may well become more of a necessity in the future for cultivating vital food crops, and therefore it is unthinkable that this precious land should be threatened by the removal of it from the Greenbelt. The St Helens Local Plan, I thought, was intended to promote employment and economic growth, yet this will have the opposite effect.

To add to this argument, as I understand it, there has been no consultation with Natural England over the loss of this Greenbelt and I quote from DEFRA the following paragraph :

*Existing planning policy in England, as set out in PPS 7, Sustainable Development in Rural Areas states that the presence of Best and Most Versatile (BMV)1 land in England agricultural land should be taken into account alongside other sustainability considerations in making decisions about planning applications. This policy is based on the Agricultural Land Classification (ALC) system, with the BMV land being defined as Grades 1, 2 and 3a. This is the land that is most flexible in terms of the range of crops that can be grown, the level and consistency of yield and the cost of obtaining it.*

Further to the above, and concerning St Helens Borough Council's Sustainability Appraisal, it is my understanding that the council's own assessment is that 8HA is the least appropriate Green Belt site allocated for housing in Phase 1!

Before any high grade Greenbelt land is sacrificed in this manner, we need to be assured that all other reasonable alternatives have been fully explored, including using other previously developed land/brownfield sites. This means that these alternatives would have less impact on the environment and lead to less need for new and disruptive infrastructure.

I trust these comments will be considered very carefully.

Yours sincerely

John Walker

Pennsylvania Farm, Holiday Moss, Rainford, St Helens WA11 8NP

